

**Director of Planning,
Planning Department,
Dun Laoghaire Rathdown County Council,
County Hall,
Marine Road,
Dun Laoghaire,
Co Dublin.**

21st December 2011

Re: Blackrock Local Area Plan Issues Paper – Pre-Draft Consultation

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Blackrock Local Area Plan (LAP) Issues Paper.

The Dublin Transport Authority Act 2008 provides that each planning authority within the GDA shall ensure that its local area plans are consistent with the transport strategy (the Greater Dublin Area Transport Strategy 2011-2030). The Authority has published a draft Transport Strategy and the final document has been submitted to the Minister for Transport for his consideration. An integrated implementation plan, which will guide investment decisions over a six year period, will follow the adoption of the Transport Strategy.

While the Transport Strategy is currently a draft document, the Authority requests that Dun Laoghaire Rathdown County Council reflect the policies, objectives and measures contained within the Draft Transport Strategy in the preparation of the Blackrock LAP.

The Dublin Transport Authority Act 2008 provides that the NTA’s report on the preparation of a local area plan shall address, inter alia, the following issues:

- (a) the transport investment priorities for the period of the Local Area Plan,*
- (b) the scope, if any, to maximise the performance of the transport system by effective land use planning,*
- (c) recommendations regarding the optimal use, location, pattern and density of new development taking account of its transport strategy, and*
- (d) recommendations on the matters to be addressed in the local area plan to ensure the effective integration of transport and land use planning.*

Investment Priorities

Comment

The Authority will continue to invest in the upgrade of pedestrian, cycle and public transport infrastructure in Blackrock based on agreed objectives and networks for these modes. There may be potential to improve public transport access to and through the area. This is dealt with in a later section.

Recommendation

To facilitate the implementation of pedestrian, cycle and public transport infrastructure in Blackrock, it is recommended that these networks and service for these modes are identified, prioritised and phased in the Blackrock LAP to ensure that future transport investment is directed to appropriate areas. The Authority is willing to assist Dun Laoghaire Rathdown County Council in this process.

Land Use Planning Issues

Comment

Measure LU3 states that Local Area Plans should ensure that there is a sequential approach to development whereby lands which are most accessible by public transport are prioritised for growth. This measure also supports general increase in densities in all areas where existing or planned public transport accessibility is good and prioritises infill areas in existing centres for increased densities.

Given that the Blackrock LAP area is well served by both rail and bus services, the provision for increased development densities in Blackrock, including the potential redevelopment and intensification of development on existing sites (e.g. Frascati Shopping Centre) and infill developments, is consistent with the Draft Transport Strategy.

Recommendation

The Authority supports increased development densities, including, where appropriate, the redevelopment of existing development sites and infill developments.

Measures LU1, LU2, LU3 and LU4 of the Draft Transport Strategy outline the land use measures that should be considered when preparing the Blackrock LAP. In particular, the LAP would be strengthened by taking account of the following principles/measures:

- All development areas provide for internal permeability for walking and cycling;
- The design of new developments incorporate new walking and cycling routes, or exploit existing direct routes, to social and commercial facilities in the central areas of Blackrock;
- Parking, where required, is located and designed in such a manner that it does not dominate the streetscape and does not compromise walking, cycling and public transport;
- The provision for the delivery of goods and services is taken into account in the design of new and existing development, to improve efficiency and minimise impact on the local community in Blackrock, and the built and natural environment;
- Severance within local catchments, particularly on key access routes, is avoided to the extent practicable.

Transport Planning

Comment

Transport planning for Blackrock and environs is an integral part of the preparation of the Blackrock LAP. This is provided for by Measure LU3 of the Draft Transport Strategy (local transport planning).

Recommendation

As part of the transport planning process, it is recommended that the Local Area Plan is prepared in consultation with the Authority and addresses, inter alia, the implementation of the following relevant measures contained in the Strategy.

1. Bus Infrastructure Measures

Comment

In preparing the Blackrock LAP, consideration should be given to improving the bus journey times and reliability through Blackrock and securing an appropriate environment for passengers waiting for buses. It should also consider the requirement to serve orbital bus routes and interchange at Blackrock Dart Station. The long term routing will depend on the future plans for Blackrock Main Street and the long term traffic management environment.

Recommendation

In relation to the bus infrastructure in Blackrock, the Authority recommends that consideration is given to the incorporation in the Blackrock LAP of the type of measures set out in Section 10.2 of the Authority's Draft Transport Strategy, to the extent relevant.

The Authority will assist Dun Laoghaire Rathdown County Council on the long-term routing of the orbital and radial bus services through Blackrock.

2. Walking Measures

Comment

Increasing the share of people travelling on foot and by bicycle supports the objectives of the Draft Transport Strategy and the success of the Strategy is fundamentally dependent on achieving an increase in such movement. There is significant potential to increase the mode share for walking and cycling in Blackrock.

Improving the links between Frascati Shopping Centre and Blackrock Dart Station is important for reinforcing the function of Blackrock as a public transport accessible town centre and a key bus/rail interchange point. This should be considered in any future redevelopment proposals relating to the shopping centres either side of Frascati Road.

Recommendation

The Blackrock LAP should consider measures to improving the walking environment between the Frascati Shopping and the Blackrock DART station.

In relation to walking measures, the Authority recommends that consideration is given, where relevant, to the applicability of the following measures from the Draft Transport Plan for inclusion in the Blackrock LAP:

- the inclusion of policies and specific measures to support walking and improvements to walking facilities (WCY8);
- restrictions on general motorised traffic travelling through Blackrock Main Street, by diverting through traffic onto suitable alternative routes (WCY1);
- the retention of access for town centre deliveries and visitor car parking in appropriate locations and at appropriate times (WCY1);
- reductions in traffic speeds in Blackrock (WCY2);
- reconfigurations to street space including widening of footpaths and rationalisation of street furniture, poles and signs, and removal of redundant poles, signs or other clutter in Blackrock and its approaches (WCY3);
- the design of new residential areas to provide a safe and pleasant movement environment for pedestrians and cyclists, including suitable lighting, with residential frontages overlooking routes, and provision of appropriate landscaping and streetscaping features along routes (WCY4);
- the provision of adequately lit footpaths on both sides of roads and streets in built up areas, except in exceptional circumstances (WCY5);
- the widening of existing footpaths, where these are too narrow to comfortably and safely cater for users (WCY5);
- the maintenance of footpaths to a good standard, and where appropriate the upgrade of footpath surfaces with higher quality materials (WCY5);
- audits of existing footpaths, identifying existing constraints and barriers to pedestrian movement such as redundant poles, signage, guardrails or telephone kiosks followed by

removal or relocation of barriers or clutter where appropriate, whilst taking account of signage requirements (WCY5);

- the provision of tactile paving and the raising of carriageways or lowering of kerbs at pedestrian crossing points and the provision of audible signals at controlled crossing points, where appropriate (WCY6);
- revisions in junction layouts where appropriate, to reduce pedestrian crossing distances, provide more direct pedestrian routes and reduce the speed of turning traffic (WCY6);
- the provision of zebra crossing points or pedestrian signals on all junction arms, at junctions where it is likely to be beneficial to pedestrian safety or convenience, starting with junctions on major roads and with higher pedestrian numbers (WCY6);
- the adjusting of traffic signal controls where appropriate to reduce the wait time for pedestrians in Blackrock and environs (WCY6);
- additional pedestrian crossing points away from junctions, with greater use of zebra crossing facilities or rapid response pedestrian signal facilities (WCY6);
- provision of wheelchair and buggy friendly pedestrian islands where islands are provided at crossing points (WCY6).

3. Cycling Measures

Comment

The Authority has funded improvements to the cycle network in Blackrock, including the provision of a contraflow cycle track on Newtown Avenue. The Authority will continue to invest in improving the cycling environment in the Blackrock area. A particular priority for the Authority is to provide for enhanced walking and cycling access along the corridor between Blackrock Park and Blackrock Dart Station (as provided for by the existing Development Plan).

The Authority is working with Dun Laoghaire Rathdown County Council in the preparation of a county-wide cycle network. It is recommended this emerging network is acknowledged in the Blackrock LAP and that proposals emanating from this cycle network be reconciled with the objectives contained within the LAP.

Recommendation

The Authority recommends that a priority be placed on providing an enhanced walking and cycling link between Blackrock Park and the Blackrock Dart Station.

The Authority recommends that the proposed county wide cycle network is acknowledged in the Blackrock LAP and that proposals emanating from this cycle network be reconciled with objectives contained within the LAP.

In relation to cycling measures, the Authority recommends that consideration be given, where relevant, to the applicability of the following measures from the Draft Transport Plan for inclusion in the Blackrock LAP:

- measures to improve the cycling environment in Blackrock and its inner approaches before other areas of the network (WCY11);
- improving cyclist priority and safety at junctions (WCY12);
- providing high quality segregated cycle lanes, or off road cycle tracks, where speeds or volumes of traffic remain high (WCY12);
- providing more direct routes for cyclists, including the introduction of cycle contraflow lanes on one-way streets, and the creation of new pedestrian and cycle only links where appropriate (WCY12);
- providing secure on-street cycle parking (WCY15) and secure, sheltered on-site cycle parking and supporting facilities for cycle commuters at:
 - Schools and other education facilities;
 - Workplaces; and
 - Other destinations likely to attract cyclists (WCY16);

The Authority's guidance on cycling planning and provision is contained in www.cyclemanual.ie and any cycle measures within the Local Area Plan should be consistent with this guidance.

4. Traffic Management Measures/ Roads Issues

Comment

The current function, shape and use¹ of Rock Road/ Frascati Road/ Temple Hill/ Newtownpark Avenue is not compatible with supporting increased walking and cycling mode share in the Blackrock area. The design of this section of road is not cycle/ pedestrian friendly and acts as a barrier for movement within the local catchment of Blackrock Village. This road will need to cater for an assumed increase in pedestrian activity associated with any intensification of development along Frascati Road and also provide for improved pedestrian accessibility to public transport services, employment, retail and other uses, either side of the Frascati Road and within Blackrock Village itself.

Recommendations

The Authority recommends that the long term function, shape and use of Rock Road/ Frascati Road/ Temple Hill/ Newtownpark Avenue be addressed in the Blackrock LAP to facilitate an improved cycling and walking environment and to address the severance impact on these modes.

The National Transport Authority requests your consideration of the above comments and would welcome the opportunity to discuss the preparation of the transport objectives in this plan.

Yours sincerely,



Hugh Creegan

Director of Transport Planning and Investment

¹ See page 15 of the Traffic Management Guidelines