

**Senior Executive Officer,  
Planning Department,  
Dun Laoghaire Rathdown County Council,  
County Hall,  
Marine Road  
Dun Laoghaire.**

18th October 2011

**Re: Draft Goatstown Local Area Plan**

Dear Sir/Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Draft Goatstown Local Area Plan.

Section 31E(1) of the Dublin Transport Authority Act 2008 assigns the Authority<sup>1</sup> a role in the making of a Local Area Plan. Where a notice is received by the Authority under section 20(3)(a)(i), it shall 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 making, amending or revoking a local area plan.

Among other issues, such reports should address 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.*

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<sup>1</sup> As amended by section 30(C) of the Public Transport Regulation Act 2009

### **General Comment**

While investments in public transport projects is likely to be limited in the short-term within the LAP area, the Authority will continue to invest in the upgrade of the pedestrian, cycle and bus network on a case by case basis. There may be potential to improve the north south bus route and to provide for the proposed orbital bus route through the LAP area. This could be achieved by, for example, providing priority for buses at junctions. While these routes have not been specifically identified in the Strategy, improvements to these corridors could potentially facilitate improved public transport access for and through the area. The Authority recommends that this is acknowledged in the LAP.

In the longer term, there are proposals for the Eastern Bypass and the “Blue Line” which traverse the LAP area. These projects are dealt with below.

Much of the land within the LAP area has been developed for residential uses. There is a limited amount of residual land which the Draft LAP which has identified as appropriate for mainly residential development, including “The Goat”, Topaz, Knockrabo and the former Victor Motors site. The Authority is satisfied that the development proposals are appropriate for these sites, given their location within the Metropolitan area and their proximity to the bus and Luas network. The design of the Knockrabo sites would have to take the Eastern Bypass alignment into consideration and not provide for direct access to this road. It is further recommended that the development guidance for the “The Goat” and Topaz sites should include provision for improved pedestrian access between these two sites. Furthermore, it is recommended that Objective NC1 (related to neighbourhood centres) should be amended to incorporate an objective for improved pedestrian access from the residential area in their immediate catchment.

The Authority has published a Draft Transport Strategy and the consultation process for the Draft Transport Strategy is complete. The final document has been submitted to the Minister for Transport for approval. The recommendations on the matters to be addressed in the local area plan to ensure the effective integration of transport and land use planning is assessed below by comparing the objectives within the Draft LAP against a selection of measures contained within the Authority’s Draft Transport Strategy.

### **Measure LU1**

*...focus any person-trip intensive development outside Dublin City and Designated Town centres to locations served by stations on the existing and proposed rail network.*

### Comment

The Draft LAP is located outside of Dublin City (as defined by Draft Strategy) and the Designated Town centres. There are no person trip intensive developments proposed within the LAP area. Therefore, the draft LAP is consistent with the Draft Transport Strategy.

### Recommendation

No change to the draft LAP is recommended.

### **Measure LU2**

*Measure local area plans should ensure that:*

- *All development areas provide for internal permeability for walking and cycling;*
- *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;*
- *Severance within local catchments, particularly on key access routes, is avoided to the extent practicable;*
- *A mix of dwelling types will be provided to facilitate and encourage mixed residential communities to establish;*

### Comment

In general, the Draft LAP is consistent with Measure LU2, in particular:

- All the major development areas within the LAP area are provided with development guidance that facilitates increased permeability for cyclists and pedestrians. In relation to the proposed development on the northern Knockrabo site, there may be potential to facilitate an improved cycling and walking route from Goatstown to UCD. It is recommended that a specific policy be included in the Draft Plan to investigate the possibility of improving cycle and pedestrian routes from Goatstown to UCD via the northern Knockrabo development site.
- RD1 of the Draft LAP provides for a mix of dwelling types which would facilitate and encourage mixed residential communities to establish.
- MT8 of the Draft LAP states that new car parking areas shall be considered in terms of their overall contribution to the public realm. It is recommended that this objective be strengthened to ensure that car parking does not dominate the streetscape and does not compromise walking, cycling and public transport.

### Recommendation

It is recommended that a specific policy be included in the Draft Plan to investigate the possibility of improving cycle and pedestrian routes from Goatstown to UCD via the northern Knockrabo development site.

It is recommended that MT8 of the Draft LAP be strengthened to ensure that car parking does not dominate the streetscape and does not compromise walking, cycling and public transport.

#### **Measure LU4**

*All non-residential development proposals in the GDA should be subject to maximum parking standards.*

#### **Comment**

This measure is implemented by MT7 of the draft LAP.

#### **Measure Road 2/ Measure Bus 7**

The draft Strategy mentions two major transport infrastructure projects whose alignments traverse the plan area. *Measure Road 2 of the draft Strategy states that the Authority will seek the protection of an Eastern Bypass route corridor for a possible future transport scheme that may be implemented after 2030. Measure Bus 7 of the draft Strategy states that a number of BRT studies have been carried out, including the "Blue Line Proposal" and that the potential of these proposals will be assessed by the Authority.*

#### **Comment**

Section 5.3 and Section 5.4 of the draft Goatstown LAP reflect these measures.

#### **Measure WCY 6**

*The Authority will seek revisions in junction layouts where appropriate, to reduce pedestrian crossing distances, provide more direct pedestrian routes and reduce the speed of turning traffic.*

#### **Comment**

Section 5.2 of the Draft LAP discusses the Goatstown Crossroads and states that any downgrading of the movement function of Goatstown Crossroads would inevitably increase traffic delays and significantly reduce the overall capacity and efficiency of the junction and is not a realistic option. The Authority would concur that this junction has an important traffic function. However, this junction has also an important pedestrian, cycling and public transport function. The Authority recommends that this objective is acknowledged in section 5.2 of the Draft LAP and that the design of the junction is optimised to facilitate improved pedestrian, cycling and public transport facilities, without significantly diminishing its traffic function.

#### **Recommendation**

The Authority recommends that the pedestrian, cycling and public transport function of Goatstown Cross is acknowledged in section 5.2 of the Draft LAP and that the design of the junction is optimised

to facilitate improved pedestrian, cycling and public transport facilities, without significantly diminishing its traffic function.

**Measure WCY 11:**

*The Authority will target measures to improve the cycling environment in areas where there is the greatest potential for trips in cycling distance range.*

**Comment**

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 Goatstown LAP and that proposals emanating from this cycle network be reconciled with the objectives contained within the LAP.

**Recommendation**

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

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

Yours sincerely,



**Hugh Creegan**

Director of Planning and Investment