

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

21<sup>st</sup> December 2011

**Re: Dun Laoghaire Local Area Plan Issues Paper – Pre-Draft Consultation**

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Dun Laoghaire 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 Dun Laoghaire 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 Dun Laoghaire 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. The status of the route serving Dun Laoghaire Port is also dealt with later on in this submission.

### *Recommendation*

To facilitate the implementation of pedestrian, cycle and public transport infrastructure in Dun Laoghaire, it is recommended that these networks and service levels are identified, prioritised and phased in the Dun Laoghaire LAP to ensure that future transport investment is directed to appropriate areas at the appropriate time. The Authority is happy to work with Dun Laoghaire Rathdown County Council in this process.

## **Land Use Planning Issues**

### *Comment*

Measure LU1 states that the Authority, in relation to the settlement hierarchy in the GDA, will seek to focus person-trip intensive development, particularly key destinations such as retail and offices into Designated Town centres within the GDA. Consistent with this measure, the Authority supports the location of person trip intensive development in the Dun Laoghaire LAP area.

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. This measure also supports the 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 Dun Laoghaire LAP area is well served by both rail and bus services, the provision for increased development densities in Dun Laoghaire, including the potential redevelopment and intensification of development on existing sites in the town centre and infill developments, is consistent with the Draft Transport Strategy.

### *Recommendation*

The Authority supports the location of person trip-intensive development in the Dun Laoghaire LAP area.

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 Dun Laoghaire LAP. In particular, Authority considers that 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 Dun Laoghaire;
- 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 Dun Laoghaire, 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 Dun Laoghaire and environs is an integral part of the preparation of the Dun Laoghaire LAP. This is provided for by Measure LU3 of the Draft Transport Strategy (local transport planning).

### *Recommendation*

As part of the transport planning process, and in the formulation of transport policies and measures for the local area plan, it is recommended that the Council and the NTA work together and prioritise the implementation of the following relevant measures contained in the Draft Transport Strategy.

## **1. Bus Infrastructure Measures**

### *Comment*

In preparing the Dun Laoghaire LAP, consideration should be given to improving the bus journey times and reliability through Dun Laoghaire Town Centre and securing an appropriate environment for passengers waiting for buses. It should also consider the requirement to serve orbital bus routes and bus/ rail interchange at Dun Laoghaire Rail Station.

### *Recommendation*

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

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

## **2. Interchange Issues**

### *Comment*

As the public transport network improves, and with better integration of fares, tickets and travel information, multi-leg journeys across the public transport network should become far more common. For this reason it will become increasingly important to provide a high quality environment for those changing from one service to another. Measure INT 4 of the Draft Transport Strategy states that the Authority will seek the provision of high quality passenger interchange points between public transport services in Metropolitan town centres. Specifically, figure 10.4 of the Draft Transport Strategy identifies the environs of Dun Laoghaire Town Centre as a key public transport interchange point between bus and rail. In 2006, the DTO produced a Dun Laoghaire Interchange Preliminary Design Report which recommended a number of measures to revitalise the interchange area and its immediate environment. This included the utilisation of the north side of the station for bus turnaround and parking facilities. It is recommended that these measures are considered in the preparation of the Dun Laoghaire Local Area Plan.

### *Recommendation*

It is recommended that the role of the Dun Laoghaire public transport interchange be acknowledged in the Dun Laoghaire LAP and the recommendations of the DTO's Dun Laoghaire Interchange Preliminary Design Report be considered in drafting the plan.

## **3. 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 Dun Laoghaire and environs.

### *Recommendation*

In relation to walking 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 Dun Laoghaire LAP:

- the inclusion of policies and specific measures to support walking and improvements to walking facilities (WCY8);
- 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 Dun Laoghaire (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 Dun Laoghaire 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 Dun Laoghaire 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).

#### **4. Cycling Measures**

##### *Comment*

The Authority has contributing funding for improvements to the cycle network in Dun Laoghaire, including cycle infrastructure on Crofton Road, Marine Road and in Glenageary. The Authority will continue to invest in improving the cycling environment in the Dun Laoghaire area.

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

##### *Recommendation*

The Authority recommends that the proposed county wide cycle network is acknowledged in the Dun Laoghaire 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 Dun Laoghaire LAP:

- measures to improve the cycling environment in Dun Laoghaire and its inner approaches before other areas of the network (as generally provided for by 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 provision is contained in [www.cyclemanual.ie](http://www.cyclemanual.ie) and any cycle measures should be consistent with this guidance.

## 5. Traffic Management Measures/ Roads Issues

### *Comment*

Measure Road 5 supports the declassification of national roads inside the M50 C-ring to regional road status except for the Dublin Port Tunnel and a route serving Dun Laoghaire Port. The operation of this port is changing over time. The volume of port trade has reduced significantly over the last number of years, resulting in a reduced volume of port related traffic (e.g. HGVs) along Crofton Road/ Seapoint Avenue. Given this changing environment, consideration should be given to the future function, shape and use<sup>2</sup> of the Dun Laoghaire port access route (N31) and ultimately its future as a national road.

### *Recommendations*

The Dun Laoghaire LAP should address the long term impacts of changes of Dun Laoghaire port operations on the likely associated changes in the function, shape and use of the Dun Laoghaire port access route (N31).

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

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<sup>2</sup> See page 15 of the Traffic Management Guidelines