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9th November 2016

RE: Rathdrum District Local Area Plan

Dear Sir/Madam,

The National Transport Authority (the "Authority") has reviewed the material published as part of the pre-draft consultation and makes the following comments:

Legislative Background

Section 19 (2A) of the Planning and Development Act (as amended) states that each planning authority within the GDA shall ensure that its local area plans are consistent with the transport strategy of the NTA. The Transport Strategy for the Greater Dublin Area 2016-2035 (the "Transport Strategy") was approved by the Minister for Transport, Tourism and Sport in early 2016.

In order to demonstrate consistency with the Transport Strategy, the Authority recommends that the following are considered in the making of the Draft Local Area Plan.

Land Use Integration

Section 7.1.2 of the Transport Strategy sets out a number of strategic and local planning principles, which should guide development in the GDA. These principles must be considered in the making of the Draft Local Area Plan, and are set out below:

- 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;
- All non-residential development proposals in the GDA should be subject to maximum parking standards and based on public transport accessibility;
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance;

- 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;
- 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, in order to a give competitive advantage to these modes;
- 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; and
- To the extent practicable, proposals for right of way extinguishments should only be considered where these do not result in more circuitous trips for local residents accessing public transport, or local destinations.

In order for the Draft Local Area Plan to be considered consistent with the Transport Strategy, it must demonstrate that the land use zonings, and the transportation and planning policies and objectives are aligned with the above principles.

Transport Priorities for Rathdrum

Chapters 5 and 6 of the Transport Strategy set out the transport investment priorities for the Greater Dublin Area over the next 20 years. While the Strategy timeline is significantly longer than that of the Local Area Plan, many policy measures related to services apply universally throughout the region and are being rolled out on an on-going basis, and many smaller localised infrastructural improvements are identified and undertaken by the Authority on a short to medium-term basis. As such, specific policies and objectives which facilitate or provide for the following should be included the Draft Local Area Plan:

- Any identified upgrades and enhancements to Rathdrum Train Station buildings and facilities;
- The provision of on-street directional signage to public transport facilities;
- Rationalisation and upgrading of bus stops, bus bays and shelters;
- The implementation of the GDA Cycle Network Plan;
- Provision of cycle parking on-street and at public transport stops;
- Provision of a safer, more convenient and more comfortable walking environment, including signage, junction reconfigurations, and improved crossings;
- Road projects which are in accordance with the Principles of Road Development as set out in section 5.8.3 of the Transport Strategy;
- Measures which seek to reduce commuter parking and which contribute to greater turnover for parking for non-commuter purposes.

National Transport Authority Guidance Documents

In addition to the above recommendations related to the Transport Strategy, the Authority recommends that the Draft Local Area Plan contains policies and objectives which state that transport and land use planning in Rathdrum will be guided by the following documents:

- The National Cycle Manual;
- · Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers; and
- Toolkit for School Travel.

I trust that the views of the Authority will be taken into account in the making of the Draft Local Area Plan.

Yours sincerely,

Michael MacAree

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Head of Planning and Data Analysis

