

Senior Executive Officer,
Forward Planning Section,
Land Use, Planning and Transportation Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24

29th March 2016

Re: Material Alterations to South Dublin County Council Draft Development Plan 2016-2022

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Material Alterations to the South Dublin County Draft Development Plan 2016-2022. Having reviewed the Material Alterations, the Authority makes the following recommendations in order to ensure consistency between the Development Plan and the Draft Transport Strategy for the Greater Dublin Area.

1. H3 SLO 1 – Residential Development at Edmonstown

The inaccessible location and the extensive scale of the lands in question render its potential development for general low-density housing inconsistent with the Draft Transport Strategy, which states that residential development should be prioritised in areas well served by public transport. The use of Edmonstown as a retirement village, however, would not be regarded in such a manner, due to the lower trip rates and off-peak travel patterns which generally pertain to such developments.

Recommendation:

The Authority recommends the reinstatement of the original wording of this objective, which was to provide for a retirement village.

2. H8 SLO2 – Coolamber, Lucan

Both aspects of this objective are inconsistent with the Draft Transport Strategy. First, the objective seeks to unreasonably restrict residential density at a location served by a frequent bus service and within walking distance of Adamstown train station. Secondly, the highly-prescriptive statement related to the detailed design of any emerging development proposal seeks to formally embed

segregation in the urban environment, contrary to the principle of enhancing permeability. As such, its application would discourage walking, cycling and public transport.

Recommendation:

It is recommended that, in order to demonstrate consistency with the Draft Transport Strategy, this objective is removed in its entirety and any proposed development for this site is assessed on its planning merits against the residential zoning objective and other relevant policies.

3. H8 SLO3 – Densities at Red Cow

Similar to the above, this objective seeks to unreasonably restrict residential density at a location served by a range of bus services and within walking distance of the Red Cow Luas stop, and which contains a number of multi-storey apartment blocks and commercial buildings.

Recommendation:

The Authority recommends this objective is removed, in order to demonstrate consistency with the Draft Transport Strategy and that any proposed development for this site is assessed on its planning merits against the residential zoning objective and other relevant policies.

4. 6.4.0 – Roads and Bridges

The Authority notes that our recommendations, and those of Transport Infrastructure Ireland, in relation to proposals affecting the national road network, have not been reflected in the Material Alterations document.

The previous proposal for a new bridge over the River Dodder between Firhouse and the N82 could potentially provide an option for a Bus Rapid Transit route to Tallaght and/or an enhanced orbital bus route. Consideration should be given to designating this bridge solely for the use of public transport, walking and cycling.

Recommendation:

It is recommended that the previous proposal for a new bridge over the River Dodder between Firhouse and the N81 is reinserted into the plan. It is further recommended that consideration is given to designating this bridge solely for the use of public transport, walking and cycling.

5. Stadium as a new Land Use Class

The Authority notes the inclusion of a Stadium as a new land use class, permitted in principle in new residential communities, regeneration areas, Town Centres and District Centres. It is also listed as open for consideration in a range of other zonings. As this alteration has arisen from a stated need for a 25,000-seater stadium, the Authority recommends close consultation in the event that such a proposal is brought forward. Given that South Dublin is made up of suburban, outer-suburban and rural lands with no existing or planned major public transport hubs of the scale that has served such developments to date in the Metropolitan Area, the Authority has some concern in this regard, particularly in relation to potential impacts on the national road network.

The National Transport Authority requests your consideration of the above comments and would welcome further discussion and cooperation in the finalisation of the South Dublin County Development Plan.

Yours sincerely,



Hugh Creegan,
Director of Transport Investment and Taxi Regulation

