

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

11th April 2016

Re: Pre-Draft Consultation on the Clonburris Strategic Development Zone - Planning Scheme

Dear Sir/ Madam,

The Authority welcomes the opportunity to comment on the pre-draft consultation for the making of a new Planning Scheme for the Clonburris Strategic Development Zone, and will provide any support necessary to South Dublin County Council during the process. Due to its location contiguous with the existing built-up area of Dublin, served by a commuter rail station, and another existing station to be opened as development occurs, Clonburris is regarded as a high priority development area by the Authority. This submission will focus primarily on the transport infrastructure proposals of relevance to the SDZ in the short, medium and long-term, and the associated quantum and nature of development that could be supported by such levels of service provision.

1. Transport Strategy for the Greater Dublin Area

The following infrastructural elements of the Transport Strategy are of relevance to Clonburris:

- Phoenix Park Tunnel;
- DART Expansion Programme; and
- Core Orbital Bus Corridor.

Development at Clonburris will also benefit from general improvements to bus priority in the area and from investment in the regional Cycle Network.

In the immediate term, it is intended to commence running train services from the Kildare Line into Grand Canal Dock via Connolly, Tara and Pearse stations through the Phoenix Park Tunnel line. This will connect the SDZ directly into the City Centre for the first time by passenger rail, facilitating the early development of housing, in particular close to the existing Clondalkin / Fonthill station and close to Kishoge station, which it is intended to open in line with population growth within its catchment.

The Authority has commenced design and planning work on the strategy's Core Bus Network. At present, it is not envisaged that Clonburris would be served by a Core Radial Bus route to connect to

the City Centre, due mainly to the service offered by rail. As this work progresses, however, there is potential to extend the relevant route as far as the SDZ. The Authority will undertake this work in close consultation with the Planning Scheme team in order to ensure consistency between the two agencies.

In the medium term, it is intended to deliver full bus priority along the orbital bus corridor from Blanchardstown to Tallaght via Clonburris, using the Fonthill Road. This will deliver a high-frequency, high-speed and reliable bus connection which will provide an attractive alternative to the car for trips between the suburbs to the west of Dublin.

In the longer term, it is intended to electrify the Kildare Rail Line from Hazelhatch to the City Centre and construct an underground tunnel to facilitate high-frequency, high-speed and reliable travel from Clonburris directly by high-capacity rail to the south city centre and Docklands. This will provide a significant opportunity for those living in Clonburris in accessing the City Centre, and other locations on the metropolitan, regional and national rail network via interchange.

Recommendations:

The Authority therefore recommends that, where deemed appropriate, the planning scheme contains explicit reference to the above infrastructure schemes, with their alignments shown in the scheme maps, as well as reference to the following in the appropriate places in the Planning Scheme:

- The Greater Dublin Area Cycle Network Plan, particularly the primary and Greenway routes;
- The National Cycle Manual;
- The M50 Demand Management Study;
- Spatial Planning and National Roads;
- Permeability – A Best Practice Guide;
- Achieving Effective Workplace Travel Plans – Guidance for Local Authorities;
- Workplace Travel Plans – A Guide for Implementers; and
- The Toolkit for School Travel.

2. Scale and Nature of Development

The existing Clonburris Planning Scheme and Local Area Plan proposes between 12,500 and 15,005 dwelling units, giving a density range of between 84.5 and 101.4 dwellings per hectare. Almost 300,000 sq.m. of non-residential floorspace is also provided for. This quantum and intensity of development was predicated on the delivery of a major transport interchange between two high capacity rail lines – the Kildare line DART and Metro West. While the former, as part of the DART Expansion Programme, is a cornerstone project of the Transport Strategy, Metro West is not being pursued in the long-term. Instead, it is proposed to develop a Core Orbital bus corridor which would provide frequent services with full bus priority linking the western suburbs, in a similar manner to that envisaged by Metro West, and along the same Fonthill Road alignment through the SDZ. As such, the Clonburris SDZ will be served by 2 DART stations and a Core Orbital bus route, with the potential for a Core Radial route to be extended into the scheme lands.

Recommendations:

Given the above revised level of public transport capacity proposed to service Clonburris, relative to that envisaged during the making of the existing planning scheme, the Authority recommends that the quantum of development proposed in the SDZ is also revised. In particular, the amount of retail

and employment floorspace proposed to serve a non-local catchment needs to be significantly reduced in the new planning scheme, as the proposed level of accessibility to the wider Metropolitan area in terms of potential capacity has been lowered.

In terms of residential development, the location of Clonburriss on an existing rail line, which will benefit from increased services and accessibility in the immediate term, and significant improvements in the long term, means that this is an appropriate location for medium to high density residential development, when the SDZ is taken as a whole. The Authority emphasises the requirement to maximise the numbers of people living close to and within walking distance of high-capacity rail, and as such, the planning scheme should focus the highest intensity of residential development at the train stations, with the density falling away towards the edges of the SDZ, adjacent to existing neighbourhoods.

3. Location and Design of Commercial Development

The Authority would fully support the application of a hierarchy of commercial development and local and district centres based on accessibility to public transport and proximity to residential catchments, similar to that which applies to the existing Planning Scheme and that for Adamstown.

Recommendations:

In line with the above statement on the need to reduce the intensity of development relative to the existing Planning Scheme and concomitant with the revised level of public transport accessibility as a result of Metro West no longer being pursued, the Authority recommends that the highest intensity of commercial development and District Centre uses remain focussed on Clondalkin / Fonthill and Kishoge train stations, in particular any development which is likely to attract people from the wider Metropolitan Area. In the case of local centres, these should be located in the centre of their residential catchments, which may in some cases, include housing areas outside the SDZ.

In terms of design, the Authority recommends that a clear policy is inserted into the Planning Scheme stating that commercial development will be undertaken in a manner that promotes walking, cycling and public transport. Active street frontage should be developed in all District and Local Centres and large areas of surface car parking, particularly to the front of buildings should be avoided. Cycle parking, in adequate numbers should be located conveniently close to entrances to shops, restaurants, offices etc.

4. Location and Design of Schools

The urban form and layout of Clonburriss should be based on reducing the need to travel by car to local services and public transport. The location and design of schools within the SDZ will be critical factors in the generation of high levels of peak hour local travel. The Authority therefore emphasises the importance of close consultation with the Department of Education and Skills in order to ensure delivery of schools in Clonburriss in appropriate locations and with transport considerations to the fore in their design.

Recommendations:

As such, the Authority recommends that the following principles are adhered to in order to reduce the need to travel by car to schools and in doing so, demonstrate consistency with the Transport Strategy:

- Primary Schools should be located within or close to Neighbourhood Centres;
- Post-Primary Schools should be located within or close to District Centres;
- In zoning school sites, the potential for walking and cycling should be maximised;
- The school gate should be the focus of a fully permeable walking and cycling network, which links the school as the principal destination in an area, to the residential estates from where the pupils' and students' journeys originate;
- In principle, the segregation of modes is desirable for school traffic, as safety and certainty are the key considerations in managing movement around schools; and
- It is recommended that pick-up and drop-off for cars is limited at the school entrances and, instead, consideration given to accommodating this via off-site Park & Stride.

In relation to Kishoge Community College, the Authority recommends that the pedestrian and cycle linkages proposed in our submission on that planning application outside the boundary of the school are incorporated as objectives into the Planning Scheme and implemented in line with future development at this location.

5. Provision for Transport Within Clonburris SDZ

Notwithstanding the significant immediate and longer-term enhancements to rail provision serving Clonburris, there will be a requirement to cater for bus movement, cycling and walking throughout the SDZ in line with the build-out of the scheme lands.

Recommendations:

In order to ensure the adequate provision for rail, bus, walking and cycling, the Authority recommends policies and objectives to be inserted into the Planning Scheme to reflect the following:

- A clear phasing scheme linking residential and commercial development to the provision of transport infrastructure and services;
- Bus priority along the primary routes linking the main commercial centres, with the potential to connect to Adamstown Link Road;
- Provision for bus termination and layover of buses at or close to Fonthill / Clondalkin and Kishoge train stations;
- Permeability for pedestrians and cyclists from all residential areas to bus stops and train stations; and
- The provision of a maximum number of legible and coherent connections for cyclists and pedestrians from commercial and residential areas to the Grand Canal Greenway;

I trust that the views of the Authority will be taken into account in the making of the Draft Planning Scheme for the Clonburris Strategic Development Zone.

Yours sincerely,



Michael MacAree,
Head of Planning and Data Analysis