

Tom Vaughan,
Planning and Economic Development Department,
Civic Offices,
Wood Quay,
Dublin 8.

05th September 2012

Re: Draft Naas Road Lands Local Area Plan

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the draft Naas Road Lands Local Area Plan (LAP).

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 Greater Dublin Area Transport Strategy for the period 2011-2030. The draft Transport Strategy is complete, and is currently with the Minister for Transport, Tourism and Sport for approval. While the Transport Strategy is a draft document, the Authority requests that Dublin City Council reflect the policies, objectives and measures contained within the draft Transport Strategy in the Naas Road Lands LAP.

The Authority has collaborated with Dublin City Council on the preparation of the draft LAP to enable a consistency to be achieved between the LAP and the draft Transport Strategy for the Greater Dublin Area 2011-2030 - including the incorporation of agreed measures, policies and objectives.

Accordingly, the Authority welcomes and supports the general thrust of the LAP which aims to manage what is considered to be a challenging transitional developmental period for the area, whilst capitalising on existing public transport assets by improving accessibility at the local level, providing a higher quality of public realm and providing for a higher intensity of development over time, across a broader range of land uses.

There are two items that the Authority wishes to raise, related to the land use strategy and movement/access.

Land Use Strategy

The approach taken within the draft LAP which details the quantum of development anticipated within each land use category over specified short, medium and long term periods is supported. The reduction in the quantum of development provided for, as compared with the 2009 Naas Road Lands Strategic Plan document is also welcomed.

Whilst it is acknowledged that the quantum and mix of land uses provided for within the draft LAP is consistent with the Naas Road Lands designation as a Key District Centre (KDC), and a Key Development Area (KDA) within the Dublin City Development Plan 2011-2017, it is suggested that consideration be given to some reduction in the quantum of commercial floorspace. The basis of this suggestion is to ensure that an appropriate distribution of employment intensive uses between the City Centre and the KDCs is achieved and maintained. The need to safeguard the City Centre's function is a strong theme in the Dublin City Development Plan 2011-2017 and, in recognition of this, it is important to balance that stated aim with the development approach in the KDCs. While the efforts to date to achieve the optimal balance are recognised and acknowledged, it is the view of the Authority that some reduction in the proposed amount of commercial floorspace would be beneficial.

Movement and Transport


The Authority welcomes and supports the inclusion of policies and objectives within the draft plan including:

- pedestrian, and cycle route objectives;
- traffic management objectives;
- orbital bus route objectives; and
- objectives relating to the setbacks along the main road frontages to facilitate the upgrading of the roads for bus, cycling and walking infrastructure.

It is important that the delivery of these objectives influence the phased development as currently proposed in regard to the mix of uses, scale and pattern of development. This approach is recommended in order to identify the public transport services and infrastructure associated with each phase of development. The Authority look forward to continued collaboration on these matters and specifically in relation to appropriate traffic management measures including junction design at the main junctions within the LAP lands. The Authority consider this paramount in safeguarding and protecting the function of the Naas Road as a key artery for the city.

From the above and supporting the need to protect the role of the Naas Road, the Authority would suggest incorporating a policy limiting additional vehicular access points onto the Naas Road. The inclusion of such a policy would protect the role of this key strategic road within the LAP area.

I trust that the views and recommendations of the Authority will be taken into consideration in the preparation of the Naas Road Lands LAP.



Hugh Creegan

Director of Transport Planning and Investment