

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

27th July 2011

Re: Naas Road Lands Local Area Plan Issues Paper

Dear Tom,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Issues Paper for the 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 Authority has published a draft Transport Strategy and the consultation process for the draft Transport Strategy is complete. The final document has been amended and 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 Dublin City Council reflect the policies, objectives and measures contained within the draft Transport Strategy in the preparation of the Naas Road Lands LAP.

The Dublin Transport Authority Act 2008 provides that the NTA’s report on the preparation of the LAP 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.*

The draft Transport Strategy outlines a number of specific infrastructural measures which will impact directly on the Naas Road Lands LAP area and environs, including:

- Upgraded QBCs serving the city centre (BUS 6);
- DART Underground (RAIL 1);

- Luas BXD (RAIL 9);
- Provision of additional tracks on the Southwestern (Kildare) corridor between Cherry Orchard and Inchicore, the electrification of the rail corridor from Hazelhatch to the Heuston and the provision of additional stations at appropriate locations in the Metropolitan area (RAIL 3); and
- Luas Lucan extending to Poolbeg (RAIL 10).

Measure 6 would facilitate higher bus capacity on the road network within and in the environs of the LAP area. In relation to rail infrastructure, the measures would facilitate higher service levels and greater network accessibility from the LAP area and its environs including the improvement of accessibility from the Naas Road Lands to the commercial and employment core areas of the City Centre.

The draft Transport Strategy also outlines a number of measures which seek to improve bus and rail services (Measure Bus 1/2/4/5, Measure Rail 6). The integrated implementation plan, which will follow the adoption of the Transport Strategy, will guide investment decisions over a six year period.

These measures are aimed at enhancing accessibility to the City Centre and the Designated Town and District Centres for the maximum numbers of people. The Naas Road LAP area could be considered as a district centre under the terms of the Draft Transport Strategy and the Authority would recommend that the LAP would take into account the impact of this enhanced public transport accessibility on the area, by providing for a high quality environment for pedestrian and cycle movement at a local level, for facilitating the use of interchange between public transport services and for local trip making.

Measures LU1, LU2, LU3 and LU4 of the draft Transport Strategy outline the land use measures that should be considered when preparing the Local Area Plan. In particular, the LAP would be strengthened by taking account of the following principles/measures:

- A sequential approach to development, whereby, lands which are most accessible by public transport are prioritised for growth taking into account existing and partially completed developments and extant ten year planning permissions. Furthermore, the Authority would recommend a phasing of development to ensure that cycling and pedestrian infrastructure and public transport infrastructure/ services are delivered simultaneously with the construction of new residential units, commercial development and community facilities;
- Focus any trip intensive development outside Dublin City and Designated Town centres to locations served by stations on the existing and proposed rail network (particularly Metro and DART);
- A strong focus on pedestrian and cycling movements for local trips, with all developments providing internal permeability for walking and cycling;
- Local services are located and provided in a manner which ensures that access for the local community by walking and cycling is direct, safe and convenient;
- Severance within local catchments is avoided to the extent practicable;
- That the provision for delivery of goods and services is taken into account;
- A mix of dwelling types is provided to facilitate and encourage mixed residential communities to establish;
- The redevelopment of brownfield (previously developed) sites close to existing or proposed public transport corridors; and
- There is cooperation between Local Authorities along boundary areas including the preparation of joint plans where appropriate.

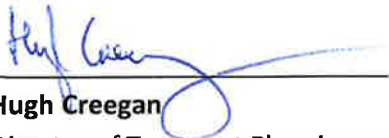
The Naas Road Lands LAP area should be viewed in the context of its function as a District Centre within its catchment and as part of the wider Naas Road area, whose accessibility would be substantially altered by the implementation of the draft Transport Strategy. The overarching policy approach taken in the draft Transport Strategy is set out in Measure OVR 1 – transport user hierarchy, and it considers transport user needs in the following order:

- Pedestrians (including those accessing public transport)
- Cyclists
- Public transport users
- Freight, delivery and waste vehicles
- Private vehicle users

This hierarchy would be most important in terms of improving the public realm for pedestrians and cyclists within the LAP lands and its wider catchment and subsequently achieving a modal shift towards the more sustainable modes of transport. It is, therefore, recommended that the Local Area Plan for Naas Road Lands would reflect this as the guiding approach in its movement strategy and in the design of the public realm.

I trust that the views of the Authority will be taken into consideration. We look forward to working with Dublin City Council in the preparation of the Naas Roads Lands LAP.

Yours sincerely,



Hugh Creegan

Director of Transport Planning and Investment