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

8th August 2012

Re: Pelletstown Local Area Plan Issues Paper

Dear Tom,

The National Transport Authority welcomes the opportunity to comment on the Pelletstown Local Area Plan (LAP) Issues Paper.

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, which has been submitted to the Minister for Transport, Tourism and Sport for his consideration. While the Transport Strategy is a draft document, we request that Dublin City Council reflect the policies, objectives and measures contained within the draft Transport Strategy in the preparation of the LAP.

Land Use Planning Issues

Measure LU1, LU2, LU3 and LU4 of the draft Transport Strategy outline a number of land use planning recommendations that should be considered when preparing the LAP. In particular, the following principles should be considered in the preparation of the draft LAP:

- A sequential approach to development, whereby, lands which are most accessible by public transport are prioritised for growth (i.e. proximate to existing and proposed rail stations).
 - This may be influenced by the current pattern of completed and uncompleted developments within the area;
- A general increase in densities in all development areas where existing or planned public transport accessibility is good;
- · All development areas to provide for internal permeability for walking and cycling;
- Connectivity by walking and cycling modes between development areas to be established or improved;

- The design of new developments to incorporate new walking and cycling routes, or exploit
 existing direct routes, to social and commercial facilities in the two village centres;
- Parking, where required, to be located and designed in such a manner that it does not dominate the streetscape and does not compromise walking, cycling and public transport;
- Severance within the local catchments of public transport nodes, the village centres and any
 other local services provided, particularly on key access routes, to be avoided to the extent
 practicable; and
- A mix of dwelling types, provided to facilitate and encourage mixed residential communities to establish.

Movement and Transport

The draft Transport Strategy outlines a number of specific infrastructural measures under Measure Rail 4 which can be applied to the Maynooth Line and by association the Pelletstown LAP lands. These include the following:

- the removal of level crossings on the line to the extent practicable and economically justifiable;
- the electrification of the line to enable the operation of DART services; and
- investigate the potential for the provision of additional stations at appropriate locations to serve existing areas and facilitate development consolidation along this rail corridor subject to ... scale of existing or planned development in the station catchment.

The provision of an additional station at the eastern end of Pelletstown could therefore complement the draft Transport Strategy, contingent on its operational and economic feasibility. Such an additional station would be contingent on an appropriate scale, density, layout and mix of uses being provided for within its local catchment and would, in part, also be supported by the removal of existing level crossings within or in the vicinity of the LAP area.

Were an additional station to be provided, its specific location, design and accessibility should be considered in conjunction with:

- the development of walking and cycling networks;
- bus routing and stop locations within the LAP lands; and
- more generally, with the density profile within the LAP lands.

Accessibility from within existing development areas to the south of the rail line should also be considered.

Walking, Cycling and associated Accessibility Issues

We consider that the LAP process is the appropriate level at which the walking and cycling networks for the Pelletstown LAP lands and contiguous areas can be identified. In this regard, the Pelletstown LAP should consider a range of complementary measures to address the following:

- Connectivity and permeability within the LAP lands and the prioritisation of improved linkages between existing completed developments:
 - An associated benefit of this could be to extend the effective catchment of the existing Ashtown rail station and the adjacent retail/ commercial development;

- Connectivity with established residential areas to the north and south of the LAP lands:
 - In terms of improving north-south walking and cycling links, the difficulties in improving walking and cycling links through the Tolka Valley area, including Tolka Valley Park are noted, due to the topography of the area. However, addressing the severance effect of this area would substantially increase the catchment potential of both Ashtown station and any additional rail station;
- East-west connectivity along the Royal Canal, particularly in regards to Broombridge Station:
 - This is of particular relevance in assessing the potential for Broombridge station to being brought within local walking catchment of the eastern end of the LAP lands (a distance from about 600 metres). Aside from having a bearing on the need for an additional station as discussed above, the recent approval of the Luas BXD scheme by An Bord Pleanala will also result in a substantial upgrading of Broombridge station and could also bring the LAP lands to within a direct walking catchment of Luas services;
- Addressing the pedestrian safety issues and severance effect of existing level crossings, in advance of their potential closure;
- Identifying the potential for providing / improving pedestrian and cyclist facilities on lands fronting River Road.

In general, cycle measures within the Local Area Plan should be consistent with current guidance on cycling planning and provision as presented in www.cyclemanual.ie.

I trust that the views of the Authority will be taken in to consideration. We look forward to assisting Dublin City Council in the preparation of the Pelletstown LAP.

Yours sincerely,

Hugh Creegan

Director of Transport, Investment and Taxi Regulation