

**Senior Executive Officer,
Planning and Enterprise Department,
Dun Laoghaire Rathdown County Council,
County Hall,
Marine Road,
Dun Laoghaire,
County Dublin**

13th May 2014

Re: Review of the Dun Laoghaire-Rathdown County Development Plan 2010-2016 and preparation of a new Dun Laoghaire Rathdown County Development Plan 2016-2022

Dear Sir/ Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the review of the Dun Laoghaire-Rathdown County Development Plan 2010-2016 and preparation of a new Dun Laoghaire Rathdown County Development Plan 2016-2022. The Authority is willing to work in partnership with Dun Laoghaire Rathdown County Council in the preparation of the new Development Plan.

Section 31B(1) of the Planning and Development Act 2000¹ assigns the Authority certain functions in the preparation of a development plan. Where a notice is received by the Authority under section 11(2) it is required to prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in the review of its existing development plan and the preparation of a new development plan.

Among other issues, such reports should address the following issues,

- (a) the transport investment priorities for the period of the development 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*

¹ As inserted by Section 95 of the Dublin Transport Authority Act 2008

(d) recommendations on the matters to be addressed in the development plan to ensure the effective integration of transport and land use planning.

Transport Investment Priorities

This section deals with transport investment priorities for the period of the Dun Laoghaire Rathdown County Development Plan. The Authority's Integrated Implementation Plan sets out an infrastructure investment programme which identifies the key objectives and outputs to be pursued by the Authority over the period of the Plan. The Authority requests that the new Dun Laoghaire Rathdown County Development Plan 2016-2022 facilitates the priorities and objectives in the plan, particularly related to the following:

GDA Cycle Network

The Greater Dublin Area Cycle Network Plan was published in April 2014. The planned network, consisting of primary, secondary and Greenway routes (through parks, along waterways etc.), comprises a mix of cycle tracks and lanes, cycleways and infrastructure-free cycle routes in low traffic environments. This plan will inform the next decade of NTA investment in cycling across seven local authority areas in the region.

The Authority requests that the GDA cycle network is reflected in the new Development Plan.

Bus Rapid Transit (BRT)

The Integrated Implementation Plan proposed to progress the development of three BRT routes, including Blanchardstown to N11 (UCD). The initial consultation process is now complete. The outcome of the public consultation will be taken on board in the finalisation of the emerging preferred route. A second public consultation will follow in a few months' time and, following the assessment of submissions made at this phase. The Authority will plan to make an application for planning permission to An Bord Pleanála.

The Authority requests that the Bus Rapid Transit proposals are reflected in the new Development Plan.

Bus Priority Measures

The current Dun Laoghaire Rathdown Development Plan has identified proposals for quality bus priority routes throughout the county. It is recommended that any proposals for bus priority measures in the new Development Plan should take into account changes to the bus network since the Development Plan was adopted and take into account the longer term changes to the bus network. The Authority will work with Dun Laoghaire Rathdown County Council to identify these changes and to reflect these in the new Development Plan.

Bus Depot Locations

The Authority is currently considering the location of bus depots in the Greater Dublin Area. The National Transport Authority (NTA) is responsible for the provision of public bus services and has legislative powers to enter into contracts with bus operators for the provision of such services as set out in the Dublin Transport Authority Act 2008 and Public Transport Regulation Act 2009.

The National Transport Authority (the "Authority") is proposing (i) to enter into another direct award contract with Dublin Bus and Bus Éireann in 2014 and (ii) to amend that contract in 2016 to reduce the services within that contract by approximately 10% and (iii) provide the removed services through a separate contract following an open tender process. If competitive tendering of contracts is carried out it is envisaged that the provision of a depot may be included as part of any competitively tendered contract.

The Authority requests that the need for new bus transport depot/s would be addressed in the new Development Plan.

Land Use Recommendations

This section deals with the scope to maximise the performance of the transport system by effective land use planning. In addition, this section will set out the recommendations regarding the optimal use, location, pattern and density of new development taking account of its transport strategy on the matters to be addressed in the development plan to ensure the effective integration of transport and land use planning.

The Authority's Integrated Implementation Plan outlines the key principles for the integration of land use and transport. These principles may be regarded as strategic in nature in that they relate primarily to the principal determinant of travel demand - the location of development. The Authority requests that these principles are reflected in the objectives in the Development Plan and inform the zoning of lands as part of the Development Plan process.

The key trip destination-focussed principles related to optimising the integration of land use and transport provision include the following:

- High volume, trip intensive developments, such as offices and retail, should primarily be focussed into Dublin City Centre and the larger Regional Planning Guidelines (RPG) higher order centres within the GDA;
- The role and function of district centres and neighbourhood centres should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling at these locations;
- Except in limited circumstances such as where specific physical requirements exist for the siting and operation of a particular land use, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high quality public transport;
- The strategic transport function of national roads, including motorways, should be maintained by limiting the extent of development that would give rise to the generation of local car-based traffic on the national road network;
- All non-residential development proposals in the GDA should be subject to maximum parking standards and should vary spatially on the basis of centrality and the level of public transport provision;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied; and

- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing guidance.

The key origin focussed principles related to optimising the integration of land use and transport provision include the following:

- Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations in the GDA; and
- To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport - including infill and brownfield sites - are prioritised.

In relation to development of identified locations, key principles to be considered from the perspective of integrated land use and transport provision include:

- Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools;
- New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes;
- Development proposals should exploit opportunities to enhance the effectiveness of transport investment;
- The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;
- Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips; and
- To the extent practicable, proposals for right of way extinguishments should only be considered where these do not result in more circuitous trips for local residents accessing public transport, or local destinations.

In relation to the Core Strategy in the new Development Plan, the Authority recommends that a sequential approach to development is provided for in the Core Strategy and that zoned lands that are substantially outside of the catchment of the existing Luas Green Line and Dart station be subjected to an order of priority for their release for development and related to the delivery of future public transport infrastructure.

The National Transport Authority requests your consideration of the above comments and would welcome the opportunity to discuss the delivery of some of the transport objectives in this plan.

Yours sincerely,



Hugh Creegan

Director of Transport Investment and Taxi Regulation