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Senior Executive Officer,  
Planning and Strategic Infrastructure Department,  
Fingal County Council,  
County Hall,  
Swords,  
Fingal,  
County Dublin.

21<sup>st</sup> March 2012

**Re: Draft Local Area Plan for lands at Baldoyle-Stapolin, Co. Dublin.**

Dear Sir/Madam,

The National Transport Authority ("the Authority") welcomes the opportunity to comment on the Baldoyle - Stapolin Draft 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 Fingal County Council reflect the policies, objectives and measures contained within the draft Transport Strategy in the Baldoyle-Stapolin LAP. The Authority would also like to comment specifically on the following issues, based on our review of the draft LAP:

## **Residential Development and Density**

The Authority fully supports the proposed development of this area, which has the potential to grow into a new residential community built upon the principles of sustainable development and travel. The LAP is in line with the draft Transport Strategy, which emphasises the need for development consolidation, and the location of significant developments in areas compatible with the provision of high quality public transport. The Authority also notes that proposed residential development and density set out in the LAP is compliant with the Department of Environment, Community and Local Government's *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)*.

The Authority would firstly acknowledge the LAPs effort to provide for flexibility in the design of building units, the density range and phasing of development, all of which should provide for a more sustainable long term build out of the area. However, and notwithstanding the fact that the LAP is in line with the policy set out in the draft Transport Strategy and the Guidance on Sustainable Residential Development, the Authority would stress the need for future residential development in this area to maximise the potential of this site, which is highly accessible to strategic public transport.

A number of new transport infrastructure projects, including increases in the frequency of DART services stopping at Clongriffin station are being considered by the Authority. However, to a large extent their funding and successful implementation depends upon a projected level of demand for the services into the future. To ensure that the assessment of these schemes stand up to scrutiny from Cost Benefit Analysis and other such measures, the Authority would stress the need for the LAP to achieve the maximum or 'preferred density' of residential development equating to 1933 housing units. In this regard, the Authority would suggest that Objective RS7 might be changed to read:

Objective RS7 Seek to achieve the densities provided for in the Preferred Density Masterplan Figure 4D.1, to ensure the development of the LAP lands will support the appropriate level of High Quality Public Transportation to serve the area.

## **Transport and Movement**

The Authority fully acknowledges the emphasis within the plan on ensuring future demands for travel to and from the development can be met by sustainable modes. The Authority consider the Baldoyle-Stapolin area as a location capable of meeting, or exceeding the mode split targets set out in *Smarter Travel – A Sustainable Transport Future*, and suggests that the LAP could include an Objective with the aim of maximising the potential use of sustainable modes to achieve these government objectives.

The Authority has been working closely with Fingal County Council, Dublin City Council and the National Roads Authority on the 'North East Transportation Study', which has been clearly acknowledged within the text of the LAP. It is foreseen that this study will outline the required provision and build out of transportation (roads and public transport) infrastructure to serve not only Baldoyle-Stapolin, but the wider north east County Dublin area. This study, once complete, will provide guidance for the provision and funding of transport infrastructure and services required to support the development of the LAP lands.

It is likely that some of the road proposals set out in the AECOM report, or variations of these proposals, will form part of the final North East Transportation Study recommendations. It is also likely that the 'Roads Requirements' outlined in the Section 6- Sequencing and Phasing of Development, will parallel the phasing approach outlined in the North East Transport Study. However, at this time, it is not possible for Authority to unconditionally support the 'Recommended Road Improvements' outlined in Section 4B.3.1 of the draft LAP. The Authority would therefore request that the status of the North East Transportation Study in defining the transport infrastructural and services requirements of the area, and phasing of delivery, is clearly set out in the text of the draft plan (specifically within Sections 4B.2.4 and 4B.3). In addition, it may be useful to amend Objective TM3, TM7 and TM8 to reflect the role that the North East Transport Study recommendations will have on the provision of transport infrastructure and services serving the Baldoyle-Stapolin area.

In general, the Authority supports the LAPs policies and objectives in relation to walking and cycling. In relation to cycling, it would be useful to reference in the NTA Cycle Manual ([www.cyclemanual.ie](http://www.cyclemanual.ie)) in the text of the LAP, and as the guidance document for the provision of cycle facilities within the plan area. In section 4B.6, the Authority suggest that the plan should include an objective to ensure the Baldoyle-Stapolin cycle network is linked into the wider GDA Cycle Network, currently being finalised by the NTA.

The Authority supports the approach presented by the LAP in relation to residential car parking. The management and control of parking will be a key element of maintaining the integrity of the Public Realm, and ensuring that sustainable modes are an attractive alternative to the private car, particularly for discretionary trips. The Authority considers that it may be appropriate to insert an objective into the LAP to reflect these issues, and ensure there is a stated policy to counter illegal/uncontrolled parking within the LAP lands by residents or visitors.

#### **Access to Services**

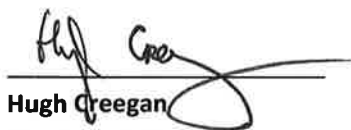
The provision and accessibility to services will be a key element in the success of the plan, particularly if sustainable modes are to be viable options. In this regard, the Authority would stress the need for the Baldoyle – Stapolin lands to be linked across the railway line to the larger scale

Clongriffin district centre which will provide a wider range of retail and services, as well as links to the Clongriffin Bus Interchange. The Authority however, welcomes the plan-led approach to the phased provision of local services within the LAP lands in tandem with population growth. The Authority supports the provision of a local centre adjacent to the rail station, which will maximise the potential for linked trips. The central location of the local centre will also maximise the potential for walking and cycling as the preferred mode. To enhance the attractiveness and use of this centre, the Authority suggests that the LAP should clearly state that key local destinations, e.g. crèche, local health facilities, public house etc. should only be located within this local centre.

The Authority is aware that the Department of Education has a school site reserved to the south of the LAP lands, in addition there are a number of existing and planned schools within the Clongriffin development lands, west of the railway. In order to maximise the potential for children to access schools by walking and cycling, it is essential that safe, well designed routes are specified in the LAP linking the school sites to the new residential areas.

I trust that the views and recommendations of the Authority will be taken into consideration in the finalisation of the draft Local Area Plan for Baldoye-Stapolin.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hugh Creegan', written over a horizontal line. The signature is stylized and includes a large loop at the end.

**Hugh Creegan**  
Director of Planning, Investment and Taxi Regulation