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

28th March 2012

Re: Draft Local Area Plan for lands at Kilmartin, Co. Dublin.

Dear Sir/Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Kilmartin 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 Kilmartin LAP. The Authority would also like to comment specifically on the following issues, based on our review of the draft LAP:

The Authority supports the consolidation of development within the Metropolitan Area of Dublin, and places a strong emphasis on the need to ensure future development supports the urban hierarchy as set out in the Regional Planning Guidelines for the Greater Dublin Area (RPGGDA). The underlying rationale for this is to ensure that the location of significant new developments are compatible with the provision of high quality public transport, and have access to community facilities and services.

Although at the edge of the Metropolitan Area of Dublin, the Kilmartin / Tyrrelstown area is a location where significant development has taken place, and is identified in the Fingal County Development Plan as a suburb of Blanchardstown, which is a RPGGDA Metropolitan Consolidation Town, and in this context could be viewed as an appropriate location to focus residential growth. The Authority however is very conscious that the Tyrrelstown / Kilmartin area does not currently have a high level of public transport accessibility, either to Blanchardstown or Dublin City Centre. As such, the Authority considers that the build out of the LAP lands will have to be carefully planned to ensure the area develops in a manner consistent with the policies set out in the draft NTA Transport Strategy.

Phasing of development

The Authority is conscious of the current market pressures which demand greater flexibility in the build out and phasing of new residential developments, and as such acknowledge the proposed phasing arrangement set out in the draft LAP. However, the Authority would stress that for Kilmartin to succeed as a new sustainable residential community, it is imperative that from the outset new households have good accessibility to local services by walking and cycling, and that a quality public transport service can be provided. To ensure the provision of a high level of public transport can be provided from the outset, the Authority would strongly recommend that development is completed on one side of the LAP lands first, e.g. West of the R121, before building commences on the other (e.g. to the East of the R121). This would ensure that the catchment for public transport services is maximised, improving the potential to provide, and maintain a high level of public transport service from the outset.

Transport and Movement

The Authority has reviewed the 'Movement Strategy and Transport Infrastructure' section of the LAP, and although the plan does address the use of walking, cycling and public transport, it is view of the Authority that this element of plan could be further strengthened to underline the important role of sustainable modes in the build out of this area. The Authority has been working closely with Fingal County Council, to development a 'Transport Framework for the Blanchardstown Area'. This framework once complete, will provide guidance on future provision of transport infrastructure and services for the greater Blanchardstown area, including Tyrrelstown/Kilmartin. The Authority would request that this Framework is acknowledged in the text, particularly in relation to the future provision of public transport to serve the LAP lands.

In relation to pedestrian movement and streetscape the Authority suggest that the new 'Design Manual for Urban Roads and Streets' (2013) guidance produced by the DoECLG and DoSTT is referred to, and used to support the proposed street hierarchy outlined in section 4.3.1.

In relation to cycling, it would be useful to reference in the NTA Cycle Manual (www.cyclemanual.ie) in the text of the LAP, and as the guidance document for the provision of cycle facilities within the plan area. The Authority also suggests that the plan should indicate that the Kilmartin cycle network will be linked into the wider GDA Cycle Network, currently being finalised by the NTA.

The Authority suggests that the Objectives set out in the plan for walking, cycling and public transport could be expanded and strengthened. The Authority, if requested, is willing to discuss proposed amendments in relation to the 'Movement Strategy and Transport Infrastructure' section directly with Fingal County Council.

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 Kilmartin lands to be well linked to the Tyrrelstown district centre which will provide for the majority of local retail and service needs. 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 recently lodged a planning application for a large secondary school to the south of the LAP lands. In order to maximise the potential for children to access this school and the adjacent primary schools by walking and cycling, it is essential that safe, well designed routes are clearly identified in the LAP, linking the school sites to the new residential areas. These routes should clearly identify measures to minimise or negate potential conflicts between pedestrian/cycle movement, and that of other modes, particularly at crossing points along the 'Avenues' and at points of interaction along the M2-N3 link road (notably the roundabout junction at the R121).

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 Kilmartin.

Yours sincerely,



Hugh Creegan

Director of Planning, Investment and Taxi Regulation