

Niamh Lambert,
Planning and Economic Development Department,
Civic Offices,
Wood Quay,
Dublin 8.

22nd April 2013

Re: Heuston Local Area Plan Issues Paper

Dear Niamh,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Issues Paper for the Heuston Local Area Plan.

The Dublin Transport Authority Act 2008 provides that the NTA’s report on the preparation of a Local Area Plan 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.*

At present, the Authority is developing an Integrated Implementation Plan for the Greater Dublin Area in accordance with S.13 of the Dublin Transport Authority Act (2008). It is anticipated that this plan would include for improvements to suburban services along the Kildare line, improvements in connections between this area and the city centre and a commitment to enhance cycle provision in the area around Heuston, including the provision of a Dublin Bikes station. Luas Cross City will also form part of the plan. All of these potential measures will impact on accessibility for the plan area.

The Authority is also required to prepare a Strategic Traffic Management Plan for the Greater Dublin Area, one aspect of which will be the development of a framework for transport in Dublin city centre, in consultation with Dublin City Council.

Notwithstanding the absence of these final plans, there are a number of principles which the Authority regard as critical in integrating land use planning with transport in an area such as this, namely:

- A sequential approach to development whereby lands which are most accessible by public transport are prioritised for growth;
- Substantially higher densities in Dublin City;
- In Dublin City... and in areas around rail interchange points there will be a greater emphasis on commercial development;
- Focus person trip-intensive development into Dublin City;
- All developments provide for internal permeability for walking and cycling; and
- That the provision for delivery of goods and services is taken into account.

Heuston station must be viewed in its context as an important node on the public transport network. At present it acts as a terminus for intercity and commuter rail from the south west while also serving as a stop on Luas and commuter bus routes. The plan area also contains St. John's Road West, a key strategic road link to west Dublin. As such, the scale of development envisaged at Heuston should reflect its position in the existing and future transport network as well as its location relative to the city centre. The Authority therefore emphasises the need to avoid a level and type of development in the plan area which could undermine the potential for such development in the central core, which will remain the focus of the suburban and regional transport networks. This relates to high-intensity commercial development which needs to be located at the hub of the transport network in order to maximise accessibility to such uses by non-car modes.

In terms of movement, this is an area whose accessibility will be altered by the implementation of measures contained in the emerging frameworks referenced above. The overarching policy approach taken to transport planning 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

The applicability of this hierarchy of transport users would appear most appropriate in central urban areas and areas close to the centre, as such locations have the highest numbers of pedestrians, cyclists and public transport users in the GDA. It is, therefore, recommended that the Local Area Plan for Heuston would incorporate this as the guiding approach in its movement strategy and in the proposed use and design of the public realm.

Associated with this hierarchy, the level of car parking proposed in the plan area should reflect the need to cater for public transport, walking and cycling on the local network. The Authority therefore recommends that the parking standards in the Local Area Plan are aligned most closely with those of Area 1 of the Dublin City Development Plan.

I trust that the views of the Authority will be taken in to consideration and we look forward to assisting Dublin City Council in the preparation of the Heuston Local Area Plan.

Yours sincerely,



A handwritten signature in black ink, appearing to read 'Hugh Greegan', is written over a horizontal line. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Hugh Greegan
Director of Transport Investment and Taxi Regulation