

Niamh Lambert,
Planning, Economic Development and International Relations,
Block 4, Floor 3,
Civic Offices,
Wood Quay,
Dublin 8.

18th June 2013

Re: Draft Local Area Plan for Ashtown-Pelletstown

Dear Niamh,

The National Transport Authority ('the Authority') welcomes the opportunity to comment on the Draft Local Area Plan for Ashtown-Pelletstown.

The Authority intends that a number of public transport measures will be delivered which will further improve the profile of the Ashtown/Pelletstown area as a location with public transport services. The LUAS Cross City terminus located at Broombridge station, will potentially be within walking distance, and will allow residents to access the LUAS network and a wide range of destinations throughout the city. Additionally, the Authority has supported Iarnród Éireann's application for permission for a new rail station at Pelletstown/Ashington. Also, the area is well served by Dublin Bus services.

In order to maximise the value of these investments, it is important that an appropriate level of development can occur at locations that are well served by public transport. The Dublin City Development Plan 2011-2017 identifies Pelletstown among the 'Key Developing Areas'. The residential capacity on the remaining lands at Pelletstown was estimated at 1800 units. It is noted that Section 4.6.3 of the draft LAP, on 'Residential Density', concludes that the LAP should provide for 940 – 1300 new units.

It is understood that the Dublin City Development Plan (2011-2017) figure of 1800 additional units took into account a number of high density residential schemes that had planning permission at the time of the formulation of the plan. The draft LAP presents a more moderate growth assumption for the LAP lands, with the development envisaged for all vacant lands on the site averaging at 54 – 74 dwellings per hectare (dph) in order to deliver the 940 - 1300 new units. If implemented, the completed development of the LAP lands would have an average residential density of 84 dph, which is considered to be a significant density of residential development.

The Authority would support the planned delivery of residential development at Pelletstown, as set out in the draft LAP, provided that the Planning Authority through its development management processes, actively seeks that the higher end of the density range that is identified for each individual site (as shown in Table 4.8) is achieved in each case. This makes it more likely that the ultimate number of residential units at Pelletstown will be at a scale that can sustain public transport services, and encourage further investment in future in services and infrastructure.

Phasing

The Authority supports the approach taken to phasing future development at this location, as it provides, in Phase 1, for a greater proportion of certain residential typologies that are not already provided for in large quantities, in that the development of Pelletstown thus far has been mainly characterised by apartments.

It is noted that the draft LAP requires that “for all Phase 1 applications, the documentation supplied shall demonstrate how this site will integrate with later phases as a minimum and for certain sites the inclusion of an overall masterplan layout will be necessary to provide a clear context for the application”. It is recommended that this measure be strengthened by including it as a Land-Use policy in the Land Use Strategy section of the LAP.

Potentially, the wording of the policy could reflect the following principles:

- Within each applicable density range, the higher end shall be the target density delivered for the development phase as a whole, with reductions only to be considered where site-specific constraints exist.
- A masterplan, forming part of the planning permission at Phase 1, must be submitted showing densities incrementally increased in subsequent phases until the landholding is fully developed, in order to achieve the overall density targets of the LAP.

- Each phase of development shall include a mix of densities, securing a mix of housing typologies, and facilitating a mix of tenures.

Movement and Transport

In terms of internal permeability for cycling and walking within development areas, as well as movement by those modes between the development areas and connectivity to the wider area around the LAP site, the Authority supports the measures included in the draft LAP. The presence of bus stops and rail stations in close proximity to each other, and to walking and cycling routes, should ensure that opportunities for interchange between all of those modes are adequately provided for.

Movement and Access Objective 7 (MAO7) seeks to facilitate the removal of the level crossing at Ashtown Road, and that the eventual design of any alternative crossing will provide for pedestrian and cycle facilities that link with existing and proposed pedestrian and cycle networks in the locality. The Authority will ensure that this objective will be considered, in the context of an overall programme of level crossing closures on the Maynooth railway line.

I trust that the views of the Authority will be taken into consideration in the finalisation of the Local Area Plan for Ashtown - Pelletstown.

Yours sincerely,



Hugh Creagan

Director of Transport Investment and Taxi Regulation