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

28<sup>th</sup> June 2013

**Re: Draft Kiltiernan Glenamuck Local Area Plan**

Dear Sir/Madam,

The National Transport Authority ("the Authority") welcomes the opportunity to comment on the draft Kiltiernan Glenamuck Local Area Plan.

Section 31E(1) of the Planning and Development Act 2000, as inserted by Section 95 of the Dublin Transport Authority Act 2008, requires that where a notice is received by the Authority under section 20(3)(a)(i) in relation to a draft local area plan:

*"the Authority shall 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 making, amending or revoking a local area plan."*

That section also requires the report should address 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."*

**Authority's Comments:**

The Authority has significant concerns with the proposals in the draft LAP for a significant growth in population (c. 7,200 – 8,350) and employment (c.4,600<sup>1</sup>) within the Kiltiernan/ Glenamuck LAP area and is unable to support the proposals in their current form.

In terms of public transport, the priority investment areas, from the perspective of the Authority, in this general locality during the period of the plan will be in enhancing the Luas service on the existing Luas line, together with limited bus network developments and sustainable transport development.

In relation to public transport and the LAP area, while the existing Luas line does serve this area, much of the residential zoned lands are outside a reasonable walking distance of the Ballyogan Luas Stop and will continue to be served by the existing bus low frequency bus routes. Accordingly, it appears that private vehicles will likely be the primary mode of transport for the majority of new residents. This will reduce the potential for the use of more sustainable modes of travel, which is contrary to Smarter Travel objectives and the principles set out in the Movement chapter of the draft LAP.

While the Authority supports the reduction and consolidation of employment zoning in the draft Kiltiernan/ Glenamuck LAP, the Authority considers that any employment growth in this area should not undermine employment proposals in the Cherrywood SDZ Planning Scheme. The Authority has worked closely with Dun Laoghaire Rathdown County Council to ensure that the adjacent Cherrywood SDZ area will be served by a high quality public transport network. There is also a phased approach to employment development which relates the releasing of lands to public transport improvements and road capacity. The current proposals for the development of employment lands in the Kiltiernan- Glenamuck LAP area, could significantly and detrimentally undermine the proposed approach in the Cherrywood SDZ Planning Scheme.

While the employment zoned land in the proposed LAP is proximate to the Ballyogan Luas stop, there Authority, as stated earlier, has no plans to significantly increase the level of public transport services in the Kiltiernan - Glenamuck LAP area. If a significant proportion of the employment lands were developed as proposed in the draft LAP, it is likely that a high car mode share would result, which is contrary to Smarter Travel objectives and the principles set out in the Movement chapter of the Draft LAP.

**Recommendations**

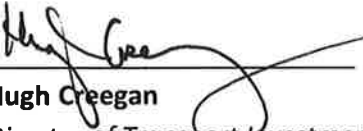
The Authority recommends that residential zoned land in the draft LAP be subjected to an order of priority for their release for development. The focus of the first phases of residential development within the LAP area should be located, in the first instance, within 1km walking distance of Ballyogan Luas Stop. In respect of the later phases of residential development, the Authority would welcome collaborating with Dun Laoghaire Rathdown County Council in preparing a public transport plan to service this area, which could then form the basis of subsequent phasing arrangements.

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<sup>1</sup> Extracted from the Glenamuck LAP Traffic Modelling Report.

In relation to employment, the Authority recommends that the employment development in the wider area should be focussed within the Cherrywood SDZ area. Accordingly, the Authority requests that the amount of zoned employment lands should be reduced substantially from the proposed level.

I trust that the views of the Authority will be taken into consideration.

A handwritten signature in black ink, appearing to read 'Hugh Creegan', is written over a horizontal line.

**Hugh Creegan**

*Director of Transport Investment and Taxi Regulation*