

Eastern & Midland Regional Assembly,
3rd Floor North, Ballymun Civic Centre
Main Street,
Ballymun,
Dublin 9,
D09 C8P5

12th January 2018

RE: Eastern and Midland Regional Assembly (EMRA) - Regional Spatial and Economic Strategy (RSES)

Dear Sir / Madam,

The attached report has been prepared by the National Transport Authority (the "NTA") in response to the notification sent by the Assembly, dated 20th November 2017, and in accordance with sections 31F and 31FF of the Planning and Development Act (2000, as amended). This report also comprises the NTA's response to the public consultation on the Issues Paper for the RSES published by EMRA.

The NTA will continue to be available to assist and cooperate with EMRA throughout the making of the RSES and I trust that the views set out in the enclosed report will be taken into account during that process.

Yours sincerely,



Michael MacAree
Head of Strategic Planning

***Report by the National Transport Authority
on matters to be taken into consideration in
the preparation of the *Regional Spatial and
Economic Strategy* for the Eastern and
Midland Regional Assembly***

January 2018

Contents

1. Introduction

The Greater Dublin Area
Midlands and County Louth

2. The Greater Dublin Area

- (i) Transport Investment Priorities for the Greater Dublin Area
- (ii) The Scope to Maximise the Performance of the Transport System by Effective Land Use Planning
- (iii) Recommendations Regarding the Optimal Use, Location, Pattern and Density of New Development
 - Strategic Planning Principles
 - Application
- (iv) The Matters to be Addressed in the RSES to Ensure Effective Integration of Transport and Land Use Planning

3. The Midland Strategic Planning Area and County Louth

4. Conclusion

National Transport Authority Report on the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly

1. Introduction

The Greater Dublin Area

Section 31F (3) (b) of the Planning and Development Act (2000, as amended) states, in relation to the RSES of the regional assemblies within the Greater Dublin Area (GDA), that the report of the NTA at this stage of the RSES plan-making process shall address the following:

- i. the transport investment priorities for the period of the Regional Spatial and Economic Strategy;
- ii. the scope, if any, to maximise the performance of the transport system by effective land use planning;
- iii. recommendations regarding the optimal use, location, pattern and density of new development taking account of its Transport Strategy; and
- iv. recommendations on the matters to be addressed in the Regional Spatial and Economic Strategy to ensure effective integration of transport and land use planning.

In respect of the GDA, i.e. Dublin and the Mid-East Strategic Planning Areas, this report will outline the response of the NTA to the above by means of reference to the *Transport Strategy for the Greater Dublin Area 2016-2035* (the “Transport Strategy”).

Midlands and County Louth

Section 31 FF of the Planning and Development Act states that in the case of a regional assembly outside the GDA, the NTA shall prepare and submit a report on the issues which, in its opinion, should be considered by the regional assembly in making a RSES. As such, in relation to the Midland Strategic Planning Area (SPA) and County Louth, while the Transport Strategy does not directly apply, it is the intention of the NTA to take a broadly similar approach in this report as is being taken for the Greater Dublin Area.

2. The Greater Dublin Area

(i) Transport Investment Priorities for the Greater Dublin Area

The transport investment priorities for the Greater Dublin Area are set out in the Transport Strategy which applies to the period 2016 to 2035. The NTA will also be preparing a 6-year Integrated Implementation Plan in 2018, which will be based on the most recent Capital Investment Plan and which will provide greater certainty on the short to medium-term transport investment programme. While the RSES period will run from 2018 to 2030, with a longer-term view up to 2038, the NTA is satisfied that the RSES would fulfil its requirement for consistency with the Transport Strategy if it

provided for the following schemes, which comprise the transport priorities for the period of the RSES up to 2030:

1. Heavy Rail

- a. The DART Expansion Programme;
- b. City Centre Resignalling Programme;
- c. Central Train Traffic Control Centre;
- d. Additional train stations where demand is identified;
- e. Replacement and refurbishment of the train fleet;
- f. Station upgrade and enhancements; and
- g. Other rail investment as set out in section 5.2.8 of the Transport Strategy.

2. Light Rail

- a. New Metro North;
- b. Metro South;
- c. Luas to Finglas; and
- d. Luas to Lucan.

3. Bus

- a. The Core Bus Network;
- b. Enhancement of the Rural Transport service; and
- c. Other bus measures as set out in section 5.5.6 of the Transport Strategy.

4. Cycling and Walking

- a. The implementation of the GDA Cycle Network Plan; and
- b. Policies related to the provision for pedestrians which align with section 5.7 of the Transport Strategy

5. Roads

- a. Reconfiguration of the N7 from its junction with the M50 to Naas;
- b. Junction upgrades and other capacity improvements on the M1 motorway;
- c. Widening of the M7 between Junction 9 (Naas North) and Junction 11 (M7/M9);
- d. Widening of the M50 to three lanes in each direction between Junction 14 (Sandyford) and Junction 17 (M11) plus related junction and other changes;
- e. Reconfiguration of the N4 from its junction with the M50 to Leixlip;
- f. Capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford);
- g. Enhancements of the N2/M2 national route inclusive of a bypass of Slane;
- h. Widening of the N3 between Junction 1 (M50) and Junction 4 (Clonee);
- i. Development of a road link connecting from the southern end of the Dublin Port Tunnel to the South Port area;
- j. Provision of additional service areas on the national road network;
- k. Provision of necessary upgrades to the national secondary road network line with the "Principles of Road Development" set out in section 5.8.3 of the Transport Strategy;

- l. Various signage, safety interventions, junction improvements and local reconfigurations on the national road network;
- m. Enhancement of regional and local roads in line with sections 5.8.2 and 5.8.3 of the Transport Strategy;

6. Other

- a. Implementation of Demand Management measures in line with section 5.9 of the Transport Strategy; and
- b. Park and Ride facilities according to emerging demand and as part of the implementation of rail and bus schemes outlined in 1, 2 and 3 above.

While the manner in which these schemes are provided for in the RSES is a matter for the Regional Assembly, the NTA recommends that the maximum level of clarity possible is provided by the use of and reference to the text of the Transport Strategy or by agreement with the NTA.

(ii) The Scope to Maximise the Performance of the Transport System by Effective Land Use Planning

The scope to maximise the performance of the transport system through land use planning will be determined by the extent to which the local authorities are empowered to direct development into those locations which facilitate the prioritisation of public transport, walking and cycling. The NTA recommends therefore that the RSES allocates population and employment growth into the settlements and / or counties which can demonstrate capacity to absorb such growth in a sustainable manner, and will benefit from enhanced transport infrastructure and services as part of the Transport Strategy.

(iii) Recommendations Regarding the Optimal Use, Location, Pattern and Density of New Development

Chapter 7 of the Transport Strategy sets out the principles regarding the optimal use, location, pattern and density of new development. The NTA recommends that these principles, set out below, are fully taken into account in the draft RSES:

Strategic Planning Principles

- Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations;
- To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised;
- High volume, trip intensive developments, such as offices and retail, should primarily be focused into City Centre locations and the higher order urban centres within defined metropolitan areas;
- Except in limited circumstances, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high capacity public transport;

- The strategic transport function of national roads, including motorways, will be protected by the full implementation of the “Spatial Planning and National Roads - Guidelines for Planning Authorities”;
- All non-residential development proposals should be subject to maximum parking standards and based on public transport accessibility;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied; and
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

Application

These principles can most effectively be applied by focussing growth into medium-high density residential, commercial and mixed-use developments on high-capacity public transport corridors, with an emphasis on existing rail lines.

In Dublin City Centre, i.e. the area inside the Canals and including Docklands, the NTA is of the view that development intensity is required to be maximised in order to take full advantage of the relatively high levels of public transport accessibility on offer in this area, and in order to promote walking, cycling and public transport across all journey purposes.

As such, the NTA would welcome the relaxation of the broad restriction currently in place on building heights across the City Centre. Additionally, in certain locations, such as the Docklands Strategic Development Zone, the environs of Heuston, Connolly and Tara Street rail stations and the Guinness site, there should be no prescribed upper limit on the height of buildings. The NTA regards such a policy change as a fundamental requirement in supporting the delivery of more higher capacity public transport connections into the City Centre, through the achievement of increased intensity of demand at destinations. In more general terms, this policy change would contribute to the development of the Dublin Metropolitan Area on a more public transport oriented and less car dependent basis, consistent with the broad objectives set out in the Draft NPF. The NTA would therefore recommend that this objective is provided for in the RSES.

In terms of suburban expansion of the city and suburbs, the following locations would be regarded as most appropriate for large-scale, trip intensive development:

- | | |
|---------------------------|---------------------------|
| • Baldoyle / Stapolin; | • Tallaght; |
| • Clongriffin / Belmayne; | • Bray; |
| • Hansfield / Barnhill; | • Cherrywood; |
| • Pelletstown; | • Woodbrook / Shanganagh; |
| • Adamstown; | • Swords; and |
| • Clonburris; | • Ballymun. |

The NTA Strategy's recommendations would support and complement the redevelopment of low-intensity industrial lands within the city and suburbs, in particular those located inside the M50 and / or on rail lines. Such lands would include:

- | | |
|----------------|------------------|
| • Naas Road; | • Clondalkin; |
| • Broombridge; | • Cookstown; and |
| • Baldoyle; | • Sandyford. |

(iv) The Matters to be Addressed in the RSES to Ensure Effective Integration of Transport and Land Use Planning

It is recommended that the RSES sets out clearly the manner in which land use plans will ensure that the transport matters above have been fully considered. There are a number of ways in which this will be achieved, as follows:

- Review of NTA Transport Strategy for the Greater Dublin Area – the Transport Strategy is required to be reviewed every 6 years. As such, a review will commence and be complete within the timeframe of this RSES. The alignment and consistency of the RSES and the Transport Strategy is of paramount importance to the effective integration of transport and land use planning, and it is recommended that this relationship is clearly set out in the RSES. The NTA will work closely with the Regional Assembly and all other relevant agencies in defining the manner of this relationship given that the current Transport Strategy is the first to be prepared and approved under the Dublin Transport Authority Act, 2009; that this is the first RSES to be prepared by the Regional Assembly under the Planning Acts; and that the spatial scope of the next Transport Strategy is envisaged as to include all of the EMRA.
- Local Transport Plans – the NTA is committed to the preparation of local transport plans for large settlements within the Greater Dublin Area. These documents will set out the local application of the recommendations outlined in (iii) above. Each plan will be based on a set of clear objectives; the most recent demographic and travel information; and take into account the policies and objectives of the local authorities, insofar as they align with those of the NTA. By undertaking such plans, the effective integration of land use and transport provided for by the Transport Strategy at the regional level, is also provided for at the local level through close cooperation between the NTA and the local authorities. It is recommended that the RSES sets out an approach to this matter by reference to these plans.

3. The Midland Strategic Planning Area and County Louth

As stated in the Introduction, this report will outline in broad terms the recommended general policies and measures which, in the view of the NTA, would address the requirements of Section 31FF of the Planning Act as they relate to the Midland SPA and County Louth. As such, it is the opinion of the NTA that the issues below should be taken into account by the regional assembly when considering these areas in the making of the draft RSES:

- The transport priorities for the Midland SPA and County Louth are as follows:
 - Maintenance of an appropriate level of rail service and its enhancement where potential exists;
 - Provision of an enhanced regional and local bus service linking the settlements, and in particular providing connections from all settlements to the highest-order centres;
 - Provision of local town bus services where appropriate;
 - Enhancement of the Rural Transport service;

- The development of the national road network in line with the priorities of Transport Infrastructure Ireland;
 - Protection of the strategic function of the national road network; and
 - Provision of an enhanced walking and cycling network within towns.
- Through the mechanism of the Local Transport Plan, it is recommended that the RSES include an objective to support and develop local public transport services in the larger towns, the delivery of which would involve the development and implementation of local bus network plans, identify key routes, destinations and associated services and supporting infrastructure requirements;
 - Development which supports the rural economy and the rural social fabric should be strongly promoted in the RSES. However, the phenomenon of urban-generated development and population growth in rural areas, which ultimately requires significant investment to serve this population and to facilitate long-distance commuting, should be addressed in the RSES, with a view to limiting a continuation of this trend and at the same time, supporting the Draft NPF objective of 'smart compact growth' in cities, large and smaller towns; and
 - The NTA's recommendations for the Greater Dublin Area as set out in sections 2 (ii), 2 (iii), and 2 (iv) above also apply to the Midland SPA and County Louth, with an acknowledgement that the context for their application may differ in certain locations from that which pertains in the GDA. As such, it is recommended that the draft RSES seeks to apply these principles across the EMRA, with specific emphasis on the preparation of Local Transport Plans for the highest-order settlements.

4. Conclusion

The NTA will be available to assist and cooperate with the Eastern and Midland Regional Assembly throughout the making of the Regional Spatial and Economic Strategy and I trust that the views set out above will be taken into account during that process.