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23<sup>rd</sup> January 2019

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

Dear Sir / Madam,

This report has been prepared by the National Transport Authority (the “NTA”) in response to the notice sent by EMRA on the 5<sup>th</sup> November 2018, in accordance with section 24 (4) of the Planning and Development Act (2000, as amended) (the “Planning Act”).

The NTA and EMRA have coordinated closely throughout the making of the Draft RSES in order to ensure that the objectives of both agencies can be met at the regional level of the planning hierarchy. As such, this submission is concerned primarily with the detailed policies and objectives of the Draft RSES and makes recommendations on how they can be amended in order to provide greater clarity and in order to strengthen their potential applicability at the local level.

### **Consistency of the RSES with the Transport Strategy**

Section 31G of the Planning Act states that the NTA shall, as part of any written submission on the Draft RSES, state whether the Draft RSES is consistent with the Transport Strategy for the Greater Dublin Area (the “Transport Strategy”) or not consistent. In the latter case, the NTA shall state what amendments are considered necessary to achieve such consistency. This provision applies to those parts of the RSES which refer to Dublin and Mid-East only (the Greater Dublin Area).

On review of the Draft RSES, the NTA is satisfied that our key objectives in terms of transport priorities for the period of the RSES are catered for, and that the overall policy platform of the RSES supports the integration of land use and transport planning. As such, the Draft RSES is consistent with the Transport Strategy, as required under Section 23 (7)(c) of the Planning Act.

The NTA is also satisfied that the RSES, in relation to the Midlands and County Louth, meets the objectives of integrated land use and transport planning, and facilitates our transport investment priorities for those areas.

## **Recommendations**

Notwithstanding the above, the NTA is of the view that a number of amendments should be made which would strengthen the RSES and give greater clarity to its role in the planning hierarchy, between the National Planning Framework (NPF) and County Development Plans. The NTA therefore, makes the following recommendations:

### **1. Growth Strategy**

The NTA supports the broad thrust of the Dublin Metropolitan Area Strategic Plan (“MASP”) and the growth strategy of the RSES. In general, housing and employment has been targeted at a select number of settlements across the EMRA, or sites within Dublin, which are directly served by existing or planned rail services. The proposed development at locations not directly served by existing and planned rail (Dublin Enterprise Zone, Fassaroe and Lissenhall) can be accommodated by their connection by high capacity bus to other parts of Dublin or to existing or planned rail systems, and by the implementation of comprehensive demand management measures.

The NTA is concerned, however, with the absence of clear direction on the control of development at the lower levels of the settlement hierarchy and the associated potential for a spread of development in an uncoordinated manner with no reference to transport services. This may lead to a scenario whereby development occurs in locations which are heavily car-dependent in advance of it occurring in locations which are more desirable from a public transport and economic sustainability perspective.

The Settlement Strategy in the RSES includes an objective to support the sustainable compact development of identified Key Towns. However, the intention to provide at least 30% of new homes within the built up area of these Key Towns does not accord with the objective of the NPF to target 40% of future housing development within and close to the existing ‘footprint’ of built-up areas, and no rationale is provided for this departure.

With the above in mind, the NTA makes the following recommendations in relation to the Growth Strategy:

- a) The NTA recommends that the Draft RSES is amended to provide clear direction as to where development should occur at the *Medium to Large Town* level in the Settlement Strategy, listing those towns which are scheduled for growth and how such growth can be accommodated by public transport or by the level of self-sufficiency envisaged in each settlement;
- b) The development of Fassaroe will be undertaken in a collaborative manner between Wicklow County Council, the NTA and Transport Infrastructure Ireland. It is clear, however, that the potential for direct linkages from this location to Dublin are limited and as such, the

reference to new public transport connections to Dublin on Page 55 of the Draft RSES should be removed;

- c) The inclusion of the Dublin Enterprise Zone (DEZ) as part of the Maynooth Line DART corridor should be clarified in a manner which emphasises the need to link its future development to improvements in bus services from the wider Dublin Metropolitan Area, and which acknowledges that the DEZ does not comprise a rail-based development;
- d) Similarly, much of the development area of Lissenhall to the north of Swords is not proposed to be served by rail and will require significant investment in bus services and associated demand management in order to function in a sustainable manner.

## 2. Strategic Development Corridors, Capacity Infrastructure and Phasing

In relation to Table 5.1, the relationship between each development area and the phasing / enabling infrastructure is not clear, in the following manner:

- There is no requirement for any infrastructure for the development of the areas listed under City Centre;
- There are also some discrepancies between the phasing set out and the proposed delivery of schemes, such as Metrolink which is scheduled for completion in 2027, which would make it a medium term project;
- It is recommended that growth in Cherrywood, Ballyogan, and Kilternan-Glenamuck, is decoupled from the Metrolink project;
- The phrase “Luas extension” should read “DART expansion” under the North-West corridor; and
- Metrolink should be referred to under the Medium term enabling infrastructure for the redevelopment of sites along the R132 in Swords.

## 3. Connectivity Chapter

The NTA is satisfied that its requirements have been incorporated into this chapter, as agreed with EMRA throughout the making of the Draft RSES. There is a potentially significant discrepancy, however, between the Draft RSES and NTA objectives under the *Guiding Principles for Integration of Land Use and Transport*, in relation to the concept of reverse commuting.

The NPF and the Transport Strategy strongly emphasise the requirement for the consolidation of development into existing centres, and the consolidation of employment into higher order centres which, by virtue of their scale and existing and planned infrastructural capacity, can accommodate growth in a sustainable manner based on public transport, walking and cycling. The concept of reverse commuting implies that investment in employment would be redirected away from such higher order centres into other settlements which do not have the capacity to cater for such growth in any manner other than by car-based patterns of development. While this does not substantively affect the assessment of the Draft RSES’s overall consistency with the Transport Strategy, this principle should be removed as it does not align with the principles and objectives of the NPF and Transport Strategy.

#### 4. Other Issues

The following additional text changes are required:

- Remove reference to “mid-term” review of the Transport Strategy;
- Remove reference to BRT; and
- Amend box on P.143 – these principles were initially provided by the NTA with the intention of their application to the Midlands and County Louth only, in order to set out our position to those locations not covered by the Transport Strategy.

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

Yours sincerely,



Michael MacAree

**Head of Strategic Planning**

CC     Minister for Transport, Tourism and Sport  
       Minister for Housing, Planning and Local Government