

Dún Scéine,
Iveagh Court,
Harcourt Lane,
Dublin 2,
D02 WT20.

Senior Executive Officer,
Forward Planning Section,
Land Use Planning & Transportation Department,
County Hall,
Tallaght,
Dublin 24

14th April 2022

Re: South Dublin County Draft Development Plan 2022-2028 – Material Amendments

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the proposed Material Amendments to the Draft South Dublin County Development Plan 2022-2028 ('the Draft Plan') and, on the basis of the *Transport Strategy for the Greater Dublin Area 2016-2035* ('the 2016-2035 Transport Strategy') and the recently issued *Draft Transport Strategy for the Greater Dublin Area 2022-2042* ('the Draft Strategy'), submits the following observations for the consideration of the Council.

Council Response to the NTA submission on the Draft Plan

NTA Recommendations Included as Amendments

The NTA made several recommendations in its submission on the Draft Plan on 15th September 2021. The NTA wishes to acknowledge the inclusion of a number of these recommendations in the Material Amendments to the Draft Plan, including:

- A new Policy Objective, QDP6 Objective 8, to cooperate with the NTA and other relevant agencies in ensuring that public realm projects fully consider the needs of pedestrian, cyclists and public transport users and that transport projects compliment public realm objectives. (Amendment 5.6);
- Amendments to H7 Objective 3 to remove the reference to vehicular permeability schemes and in the inclusion of a commitment to have regard to the National Transport Authority's Permeability Best Practice Guide (2015) or any subsequent guidelines (Amendment 6.5)
- Maintaining the inclusion of modal split targets (Section 7.4) and the inclusion of a note stating that targets are related to the lifetime of the Development Plan and that as transport

investment provides for further improvements in bus, rail and cycling schemes, the mode share outcomes for cycling and public transport will also rise. (Amendment 7.3)

- Amendments to SM2 Objective 4 to include for a commitment to the provision of filtered permeability 9Amendment 7.6)
- An amendment to EDE 4 Objective 14 removing the reference to “Traffic Movement Study” and replacing this with “Local Transport Plan” (Amendment 9.2)
- The rewording of Policy EDE5 SLO2, relating to Grange Castle, to include a commitment to prepare a masterplan incorporating a local transport plan in consultation with the NTA and TII (Amendment 9.3)
- Maintaining and strengthening the commitment to provide for Electric Vehicle car park charging points (Section 13.8.3, Amendment 13.10)

The NTA is supportive of these proposed Material Amendments and will continue to liaise with the Council as required.

NTA Recommendations Not Included Amendments

Employment and Commercial Development

As set out in the original NTA submission on the Draft Plan, the NTA notes and supports the overall thrust of Policy CS5 (Core Strategy, Section 2) which seeks to provide lands for employment in appropriate locations, and to focus high-intensity employment in areas that will benefit from accessibility to high-capacity public transport. A similar point has been made in relation to commercial development under Section 9.2.2, Policy EDE 4 Objective 4.

It is noted that no amendments to these policy objectives have been included and, in this regard, the NTA reiterates the view that the policies, and the supporting objectives, do not provide sufficient clarity and direction on the locations where such uses would be appropriate.

Recommendations

The NTA recommends that Policy CS5 is amended or augmented to provide a clear statement that development in which high-intensity uses such as office is the primary use will not be permitted in greenfield locations, not benefitting from high capacity public transport services. The NTA is of the view that such developments could be considered more appropriate on brownfield sites within the Tallaght and Clondalkin Town Centre areas; the Naas Road regeneration lands (City Edge project lands); Liffey Valley and Clonburris; or existing built-up areas served by high capacity public transport.

The NTA also recommends that Policy EDE 4 Objective 4 which relates to commercial developments is strengthened by stating that such developments will not be permitted in locations other than those set out in the draft plan text.

Further Comments on Amendments

Western Orbital

Table 7.5 of Section 7.7.2 of the Draft Development Plan, ‘New Street & Roads Proposals’, includes the Western Dublin Orbital Route. The NTA notes that, as recommended in its submission of 21st September, the wording accompanying the Western Dublin Orbital Route in Table 7.5 has been

amended to include reference to its primary function in the provision of resilience to the operation of the M50 (Amendment 7.21)

The description of the Western Orbital includes for a new road to link between the N7 and the N4 Leixlip Interchange and *'the potential for a further extension of this route from the N7 to the N81'*. Section 13.5 of the NTA's Draft Strategy deals with Regional and Local Roads. Measure ROAD 9 (2) provides a commitment to *'Enhance orbital movement between the N3, the N4 and N7 national roads, by the widening of existing roads and/or the development of new road links, for the purpose of providing resilience to the operation of the M50 and incorporating provision for sustainable transport.'* With regard to this, it is noted that the NTA's Draft Strategy does not provide for the further extension of this route from the N7 to the N81.

Section 9(6A) of the Planning and Development Act 2000 (as amended) requires that all Development Plans in the Greater Dublin Area shall be consistent with the GDA Transport Strategy. In order to ensure consistency with the GDA Transport Strategy it is recommended that the reference to the potential extension between the N7 and N81 is omitted.

Recommendation

The NTA recommends that the wording accompanying the Western Dublin Orbital Route in Table 7.5 is amended to omit the reference to the extension of the route between the N7 and the N81.

Local Transport Plans

The NTA notes Amendment 5.11 proposing the inclusion of a new objective (QDP14 Objective 6) to require a Local Transport Plan to be carried out as part of any LAP preparation process, commensurate to the scale of the LAP. The NTA support the inclusion of this Objective and recommends that the preparation of such is guided by the NTA and TII Guidance Note on Area Based Transport Assessments 2018 or any subsequent updates thereof.

Recommendation

In relation to Amendment 5.11, the NTA recommends the inclusion of a statement that in the preparation of local transport plans regard will be had to the NTA and TII Guidance Note on Area Based Transport Assessments 2018 or any subsequent updates thereof.

I trust the NTA's comments will be taken into consideration in the finalisation of the County Development Plan.

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning