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County Hall,
Tallaght,
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Submission by <https://consult.sdublincoco.ie/>

Dáta | Date 26 April 2022

Ár dTag | Our Ref. TII22-118038

Re: Proposed Material Amendments - Draft South Dublin Development Plan, 2022-2028.

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of Proposed Material Amendments to the Draft South Dublin County Development Plan, 2022 – 2028. TII made a submission to the Draft Development Plan in September 2021 (TII ref. TII21-113914) that was recorded as ref. no. SD-C195-54. The Authority welcomes the Proposed Material Amendments arising from consideration of the Authority's initial submission on the Draft Plan.

TII ordered the submission on the Draft Plan under 6 no. headings as follows: (i) Managing Exchequer Investment & Statutory Guidance; (ii) Section 28 Guidance: Spatial Planning & National Roads Guidelines; (iii) Transport Planning & National Road Schemes; (iv) Light Rail Network; (v) Other Transport Issues; and (vi) Ancillary Policy Provisions & Issues.

TII's observations in the Draft Plan submission, as in this one, seek to address the safety, capacity and strategic function of the national road network and Luas in accordance with TII's statutory functions and the provisions of official policy. To that effect TII provides the following comments for the Council's consideration. In relation to Proposed Material Amendments on display, TII outlines the following observations.

DRAFT PLAN, VOLUME 1, CHAPTER 2: CORE STRATEGY AND SETTLEMENT STRATEGY

The Authority advises that the DoELG Spatial Planning and National Road Guidelines for Planning Authorities set out planning policy considerations relating to development affecting national primary and secondary roads, including motorways and associated junctions, outside the 50-60 kph speed limit zones for cities, towns, and villages.

Planning authorities such as South Dublin must therefore develop an evidence-based approach to planning policy and undertake detailed transport modelling, as necessary.

Proposed amendment no.s 2.20 and 2.21 to Chapter 2 of the Draft Plan include land use zoning objective alterations for low population density and traffic generation land use zoning objectives Rural (RU) and Open Space (OS) to Enterprise and Employment (EE) and Local Centre (LC) land use zoning objectives in proximity to Junction 4 of the N7 and Junction 11 of the M50, respectively. Please be reminded that any development proposal shall be subject to the requirements under Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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Section 2.7 Development *at National Road Interchanges or Junctions* of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), requires that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

TII advises that the guidance indicates that planning authorities must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

DRAFT PLAN, VOLUME 1, CHAPTER 5: QUALITY DESIGN AND PLACEMAKING

Proposed Amendment 5.11, additional objective: QDP14 Objective 6 at Section 5.4.1 Local Area Plans

“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 Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA.”

The Authority welcomes the explicit commitment to the preparation of Local Transport Plans as part of intended LAPs. The Authority notes that Local Transport Plans are a cornerstone of the Transport Strategy for the Greater Dublin Area 2016 – 2035 and follow methodology based on the TII/NTA *Area Based Transport Assessment (ABTA) Guidance*, originally published in 2018.

As set out in the Authority’s submission to the Draft Plan, TII will welcome and support consultation during the preparation of the Local Transport Plans and Local Area Plan processes where there may be implications for the national road network in the area and Luas.

Proposed Amendment 5.13, additional objective: QDP16 Objective 4 at Section 5.4.3 Framework/Masterplans

“To consider the need for a Local Transport Plan to be prepared as part of any Framework/Masterplan, commensurate to the scale of the Framework/Masterplan. The Framework/Masterplan will be subject to screening for AA and SEA.”

The Authority endorses the recognition that the amendment QDP Objective 4 provides to the fundamental role sustainable transport has to play in potential Framework / Masterplans. Where there is potential national road network and / or Luas implications, TII would welcome and facilitate consultation in establishing whether a discreet Local Transport Plan for Framework/Masterplans is required.

DRAFT PLAN, VOLUME 1, CHAPTER 7: SUSTAINABLE MOVEMENT

Proposed Amendment 7.17, additional objective: SM3 Objective 26 at Section 7.6.2 Rail

“To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure are carried out in accordance with Transport Infrastructure Ireland’s ‘Code of Engineering Practice’ as may be amended.”

TII endorses the proposed amendment objective for its recognition that development potentially impacting Luas will have regard to the protection of the tramway asset in the interests of its safe and efficient operation and its fulfilment of sustainable transport objectives.

TII reiterates the existence of *TII's Light Rail Environment - Technical Guidelines for Development* PE-PDV-00001, December 2020. These guidelines have been specifically prepared to inform the design and execution of developments and related works in the vicinity of light rail. The purpose of the guidance is to ensure that the operational safety and efficiency of the light rail are maintained while improvements in accessibility, permeability and interfaces with the public realm where possible are facilitated.

The *Light Rail Environment - Technical Guidelines for Development* are intended to assist:-

- the planning authority in the assessment of planning applications; and
- potential developers in the design and execution of development in the light rail environment.

The proposed objective SM3 Objective 26 refers to planning applications and the carrying out of development. In order to reflect the contingent nature of planning applications, that require assessment and permission ahead of development and consistent with TII's initial observations on the Draft Plan, the Authority recommends consideration being given to the following text amendment of the proposed objective SM3 Objective 26:

"To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure have regard to TII's Light Rail Environment - Technical Guidelines for Development and developments arising are carried out in accordance with Transport Infrastructure Ireland's 'Code of Engineering Practice'." ~~as may be amended.~~

Please note that the proposed amendment as published annotates that SM3 Objective 26 occurs at Section 7.6.1 BusConnects of the Draft Plan but will occur under Section 7.6.2 Rail.

Proposed Amendment 7.21, to amend description and function in Table 7.5 Six Year Road programme relating to the Western Dublin Orbital Route From: New road from N81 to the Leixlip Interchange To: New road from the N7 to the N4 Leixlip Interchange with an extension to the N81.

Consistent with NDP commitments, there is no N81 extension road scheme proposal. Greater Dublin Area Development Plans are required to be consistent with the GDA Transport Strategy. In order to ensure consistency with national road commitments and the GDA Transport Strategy it is recommended that the reference to the potential extension between the N7 and N81 is omitted for the name and description of proposed amendment no. 7.21.

Proposed Amendment 7.23, additional objective: SM6 Objective 12 at Section 7.9.1 Integrated Transport Studies

"To require a Local Transport Plan to be prepared as part of any Local Area Plan, commensurate to the scale of the Local Area Plan. The Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA."

The authority observes the reinforcement of the proposed additional objective: QDP14 Objective 6 by this proposed amendment objective: SM6 Objective 12. The Authority welcomes and endorses this explicit commitment submitted to be in the interests of sustainable land use planning and the protection of investment in transportation of which the national road and existing light rail network form part.

CONCLUSION

As outlined above, TII acknowledges and welcomes proposed amendments to the Draft Plan that arise following the Council's consideration and assessment of TII's initial submission.

There remains specific provisions of the Draft Plan which the Authority requested review prior to adoption which are not subject to proposed amendment. The Authority's position in relation to these items remains as set out in TII's submission on the Draft Development Plan of 13 September 2021.

In relation to the Proposed Material Amendments on display, TII respectfully requests that the foregoing observations are taken into consideration by the Council prior to finalising the Development Plan. TII has identified proposed amendment SM3 Objective 26 which, in TII's opinion, requires revision prior to adoption in the interests of clarity and to ensure that the Development Plan provisions advance efficient and proper planning and sustainable development where development interfaces with Luas.

The Authority is available to meet the Executive of the Council to discuss any issues arising in the foregoing or other matters related to the Development Plan and the national road and existing light rail networks.

Yours sincerely,

Cliona Ryan
Land Use Planner