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1st September 2022

RE: Material Alterations to the Draft Dublin City Draft Development Plan 2022-2028

Dear Sir / Madam,

The National Transport Authority (the “NTA”) welcomes the opportunity to comment on the Material Alterations to the Draft Dublin City Development Plan 2022-2028. The observations below are made in accordance with section 9(6A) and section 31C of the Planning and Development Act (2000, as amended), which sets out the requirement for Development Plans in the Greater Dublin Area to be consistent with the Transport Strategy of the NTA. In this case, Dublin City Council is required to ensure that the City Development Plan is consistent with the Transport Strategy for the Greater Dublin Area 2016-2035 (the “2016 Strategy”).

The NTA is of the view, notwithstanding this requirement, that Dublin City Council should also seek to ensure, as far as practicable, that the City Development Plan takes account of the Draft Greater Dublin Area Transport Strategy 2022-2042 (the “2022 Strategy”), which comprises a review and update to the 2016 Strategy, and which was published in late 2021.

The NTA notes the incorporation of the majority of our substantive recommendations made at the Draft Development Plan stage and are of the view that these alterations further strengthen the consistency between the Development Plan and the 2016 Strategy.

With the above in mind, the NTA makes the following observations and recommendations.

1. Material Alteration Reference Number 7.14 Policy – Public Realm – City Centre

While the NTA broadly welcomes a move towards a low traffic environment more generally in the City, caution must be exercised in terms of the impact on cycling and public transport and balance must be struck between public realm and accessibility.

NTA Recommendation

The NTA recommends that Material Alteration 7.14 is amended to read as follows:

- To move to a low traffic environment generally and to increase the amount of traffic free spaces provided in the city centre over the lifetime of the Plan as well as create new high quality public realm areas where possible, taking into account the objective to enhance access to and within the city centre by public transport and cycling.

2. Material Alteration Reference Number 7.16 – Section 7.5.8 – Public Realm

The NTA is of the view that South William Street would be an appropriate street for the delivery of a much enhanced public realm and that it is not a route required for strategic or local traffic movement, once access to existing businesses and car parks has been resolved by means of revised traffic management arrangements or redevelopment. In the absence of an agreed alternative for cycling, however, it may be prudent to amend the wording of the proposed objective.

NTA Recommendation

The NTA recommends that Material Alteration 7.16 is amended to read as follows:

- To support the full pedestrianisation of South William Street subject to its feasibility as it relates to the accommodation of demand for cycling in this part of the city.

3. Material Alteration Reference Number 8.24 – Section 8.5.6 – Sustainable Modes

Material Alteration Reference Number 13.44 – Section 13.12 SDRA 10 – North East Inner City

Material Alteration Reference Number 13.45 – Section 13.12 SDRA 10 – North East Inner City

Material Alteration Reference Number 13.47 – Section 13.12 SDRA 10 – North East Inner City

As part of the early development of the DART+ Programme, the opportunities for additional stations in the environs of Croke Park / Ballybough were considered. However, various physical and operational constraints were identified on the existing lines in this area which would reduce the potential for a station or stations to be provided at this location.

As such, the provision of a rail station at Croke Park is not part of the scope of the DART+ West project. However, the implementation of the DART+ Programme infrastructure will provide the operational flexibility to deliver enhanced services across the expanded DART network to Drumcondra station, which is within short walking distance of the stadium, to service Croke Park during major events. In addition the existing Connolly and future Glasnevin station, which are between approximately 1.2km and 1.5km from the stadium will provide additional flexibility and resilience whilst also giving the opportunity for better crowd management and dispersal in the environs of the stadium.

NTA Recommendation

The NTA recommends that the Council consider the viability of, and the need for, the provision of a station at Croke Park as it relates to the physical constraints identified by the NTA and the presence of Drumcondra station within short walking distance, a station that is planned to be served by DART under the current NTA investment programme, when finalising the Development Plan.

4. Material Alteration Reference Number 12.25 – Section 12.5.4

In terms of supporting cultural activities, the NTA are of the view that this is a vital objective, in particular as it relates to supporting off-peak and night-time public transport services. The wording of this alteration, however, requires to be amended to remove the term “HGV” as many of these activities take place within the HGV Cordon and, in all locations, may be serviceable by LGVs.

NTA Recommendation

The NTA recommends that Material Alteration 12.25 is amended to read as follows:

- Also critical to the functioning of many larger cultural spaces is the maintenance of ~~HGV~~ delivery access of large sets/gig equipment; which needs to be taken into consideration for both applications for expansion by the venue and for proposed public realm projects immediately adjacent to such spaces

5. Material Alteration Reference Number Appendix 5.1 - Appendix 5: Transport and Mobility: Technical Requirements

The NTA note the reduction in the maximum number of car parking spaces required in Zone 1 to 0.5 spaces per unit and are satisfied that this Material Alteration is consistent with the Transport Strategy.

6. Other Matters

The NTA note a number of other Material Alterations related to transport planning and investment, and the relationship between land use planning and transport planning, including rezoning proposals. These alterations have been reviewed and the NTA are satisfied that no significant strategic issues arise.

I trust that the above will be taken into account in the finalisation of the Dublin City Development Plan.

Yours sincerely,

A handwritten signature in black ink that reads "Michael MacAree". The signature is written in a cursive style with a clear, legible font.

Michael MacAree
Head of Strategic Planning