



Planning Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin.
K67 X8Y2.

21st December 2022

Re: Fingal County Development Plan 2023-2029 – Material Alterations – Public Consultation

Dear Sir/Madam,

The National Transport Authority (the “NTA”) welcomes the opportunity to comment on the Material Alterations to the Draft Fingal Development Plan 2023-2029. 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, Fingal County Council is required to ensure that the County 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 Fingal County Council should also seek to ensure, as far as practicable, that the County 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 submission focuses on the following amendments and the reiteration of comments/recommendations made in its submission on the Draft Plan, which are not considered to have been addressed.

Material Amendments

Chapter 2 – Planning for Growth

- Section 2.4.1, Table 2.16 (p. 56)
- Section 2.7.2, Objective CSO61 - Assessment to Inform Future Transportation Needs of Rush

Chapter 3 – Sustainable Placemaking and Quality Homes

- Section 3.5.3, Objective SPQH09 – New Residential Development

Map Sheets

- Draft Sheet 12 – Blanchardstown North – PA SH 12.1
- Draft Sheet 12 – Blanchardstown North – PA SH 12.4

Reiteration of Previous Comments

- Draft Sheet 12 – Blanchardstown North – Proposed General Employment Zoning
- Objective CSO17 of the Draft Plan – Tree Lined Approaches
- Metrolink Depot at Dardistown
- Kissing Gates
- Car Parking Standards

Chapter 2 – Planning for Growth

Section 2.4.1, Table 2.16 (p. 56)

As part of our comments on the Draft Plan, it was recommended that the preparation of an LAP for Belcamp with an accompanying LTP be prioritised given that development has commenced at this location and it has been the subject of a number of SHD applications. To enable a sustainable and orderly approach to development of this strategically important location, the NTA recommends that Belcamp is reinstated in the LAP schedule as part of the finalised Plan and that its preparation is prioritised.

NTA Recommendation

The NTA recommends that this alteration be amended to reinstate Belcamp as an area for which the preparation of an LAP and LTP is an objective, to enable the sustainable development of the area, consistent with national and regional policy.

Section 2.7.2, Objective CSO61 – Assessment to Inform Future Transportation Needs of Rush

It is recommended that the reference to the potential feasibility of providing a Distributor Road to the west of Rush is removed from this objective given that the purpose of this objective in the first instance is to undertake an assessment of transportation needs in Rush. The Local Transport Plan which will be prepared under this objective will provide a robust and holistic assessment of transport needs in Rush and include comprehensive stakeholder engagement. In this regard, reference to potential interventions at this point is not considered appropriate.

NTA Recommendation

The NTA recommends that the reference to the potential feasibility of providing a Distributor Road to the west of Rush is removed Objective CSO61.

Chapter 3 – Sustainable Placemaking and Quality Homes

Section 3.5.3, Objective SPQH09 – New Residential Development

It is noted that the proposed alteration to Objective SPQH09 states that active travel and public transport options for new residential development should be considered while liaising with Transport Infrastructure Ireland. Given that this objective closely aligns with the functions of the NTA in relation

to active travel and public transport in the Greater Dublin Area, it is recommended that this objective is reworded accordingly.

NTA Recommendation

The NTA recommends that this objective is reworded to include reference to the NTA given its key role in developing and implementing active travel and public transport.

Map Sheets

Draft Sheet 12 – Blanchardstown North – PA SH 12.1

It is noted that this alteration proposes to remove Local Objective 44 which seeks to “*facilitate the provision of a turning space for public buses*” at a parcel of land in Hollystown. As part of the Bus Connects Network Redesign project, the terminus location for the proposed B3 Bus Connects spine route has yet to be finalised and it is considered that the subject location could be an appropriate terminus location where buses can turn around and begin their return journey. In this regard, it is recommended that Local Objective 44 is reinstated as part of the finalised Plan. It should be noted that the NTA are happy to liaise with Fingal County Council in relation to the exact location of such a space for public buses in Hollystown. It is considered that this objective is important to ensure the successful implementation of the Bus Connects programme which will enhance the public transport provision in this area.

NTA Recommendation

The NTA recommends that Local Objective 44 is reinstated as part of the finalised Plan and that if required the Local Authority liaise with the NTA on an alternative appropriate location for a bus turning space in Hollystown.

Draft Sheet 12 – Blanchardstown North – PA SH 12.4

The NTA notes the proposed rezoning of lands, north of the Dublin Airport Logistics Park from Greenbelt to General Employment as part of the proposed alterations. Given that this land is significantly removed from any existing or planned high-frequency public transport network, it is considered that any development permitted under the proposed zoning would be primarily car dependent. Regional Policy Objective 5.6 of the Regional Spatial and Economic Strategy for the Eastern and Midland Region states the following with regard to the location of future employment lands in the GDA:

“The development of future employment lands in the Dublin Metropolitan Area shall follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and provision of appropriate employment densities in tandem with the provision of high quality public transport corridors”¹.

In this regard, it is recommended that this proposed rezoning is not included and the lands remain under the Greenbelt zoning objective as part of the finalised Plan.

NTA Recommendation

The NTA recommends that this land is not rezoned to General Employment and that the lands remains under the Greenbelt zoning objective in the finalised Plan.

¹ Regional Spatial and Economic Strategy for the Eastern and Midland Region, Chapter 5, Page 115.

Reiteration of Previous Comments

The NTA would reiterate the following recommendations made in its submission on the Draft Plan which are not considered to have been addressed and would request that they are carefully considered as part of the finalisation of the Plan.

- ***Draft Sheet 12 – Blanchardstown North – Proposed General Employment Zoning***

The *Draft Fingal Development Plan 2023-2029* under Policy EEP2 states that GE land should be used for intensive employment purposes and should be highly accessible. Policy EEP4 further states that employment intensive land use zonings should be located adjacent to public transport networks and active travel links. Large landbanks in the North Blanchardstown area are zoned GE, including landbanks stretching up to the N2 (and to the north of it). The NTA notes that it is proposed to rezone lands from a current GB Green Belt zoning to GE General Employment zoning to the west of the R135 and east of Cherryhound and immediately south east of the M2, Junction 2 interchange.

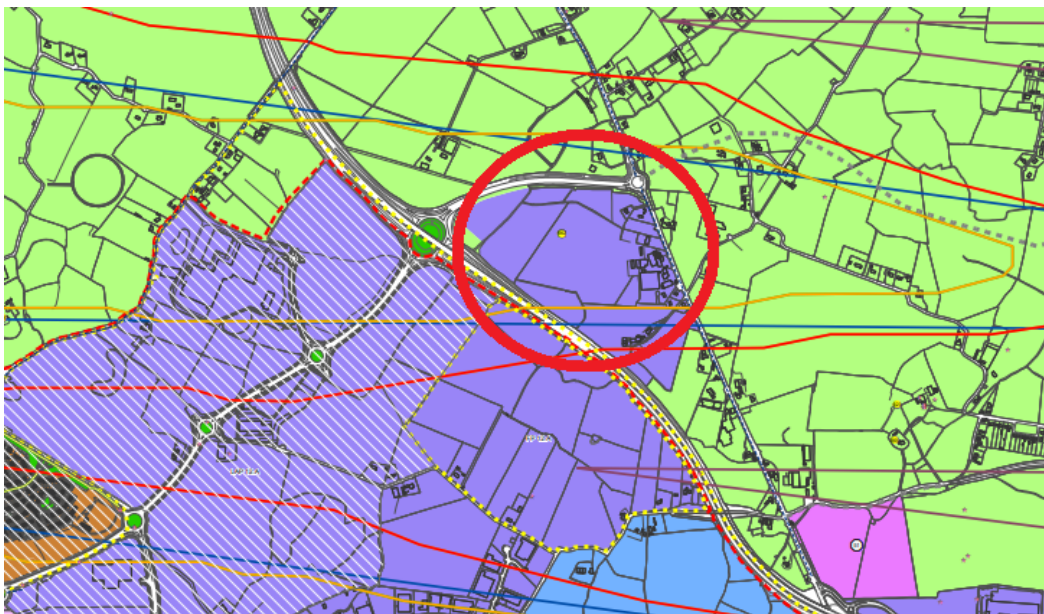


Figure 1: Extract from Draft Map Sheet 12 with the subject lands circled in red

Much of these areas are inaccessible to both current and planned public transport services. The vision for GE is to provide intensive employment purposes, yet these sites cannot provide sustainable transport options and will be primarily car dependent. A portion of the lands is indicated as requiring an LAP, however, not the entire GE zoned lands. In the absence of an LAP, the area is continuing to expand without the appropriate supporting infrastructure to ensure sustainable development.

The future zoning of these type of lands should be in accordance with the current Strategy and the *Draft Transport Strategy for the Greater Dublin Area 2022-2024*. The Strategy sets out the existing, future short-term and long-term public transport infrastructure for the GDA. Future development lands should be capable of being served by public transport in order to enable their development. The provision of private buses is not an acceptable method of providing transport where this is the sole option for future employees, is subject to the vagaries of private provision and does not tie in with the public transport network. Where the lands cannot be served by existing planned public transport, these lands should not be brought forward for development during the lifetime of the Plan.

Policy EEP2 General Employment Lands

Maximise the potential of GE lands, ensuring that they are developed for intensive employment purposes, where appropriate, and which are highly accessible, well designed, permeable and legible.

Policy EEP4 Employment Intensive Land Uses

Ensure employment intensive land use zonings are located adjacent to public transport networks and active travel links.

Objective EEO3

Require that proposals for economic development are served by quality supporting infrastructure with sufficient capacity. A sequential approach may be used for assessing economic developments to ensure their appropriate and sustainable delivery.

NTA Recommendation

The proposed rezoning of lands from a current GB Green Belt zoning to GE General Employment zoning to the west of the R135 and east of Cherryhound and immediately south east of the M2, Junction 2 interchange should be omitted at this time as these lands are not planned to be served with public transport as outlined in both the current Strategy and the *Draft Transport Strategy for the Greater Dublin Area 2022-2024*.

- **Objective CSO17 of the Draft Plan – Tree Lined Approaches**

It is suggested that Objective CSO17 should be amended to allow flexibility to deliver improved walking, cycling and public transport schemes. This will ensure active travel and public transport schemes that are critical for the sustainable movement of people within Fingal can be advanced in appropriate locations and subject to all necessary environmental assessments and appropriate mitigation measures where required.

NTA Recommendation

Amend Objective CSO17 as below.

Objective CSO17 – Tree Lined Approaches

Retain existing tree-lined approaches **to towns and villages to preserve their special character where possible or provide appropriate mitigation.**

- **Metrolink Depot at Dardistown and Dardistown LAP**

It is noted that the Dardistown LAP was developed in 2012 and was extended to 2022. The Plan does not state whether this Plan will be revisited during the lifetime of the Plan. It is important that the location of the proposed Dardistown Metrolink depot (as proposed in the Railway Order Application under An Bord Pleanála Case Reference No. NA29N.314724) is reflected on relevant maps in an updated LAP and the finalised Plan. The depot which will be located west of the proposed metro station at Dardistown will be a significant facility and central to the operation of Metrolink. In this regard it is also recommended that an objective is included in the finalised Plan to update the Dardistown LAP to ensure it accurately reflects MetroLink and plans for the sustainable development of the surrounding lands.

NTA Recommendation

That the Plan includes a specific local objective to provide for the MetroLink Depot at Dardistown and that the Dardistown LAP should be updated/revisited to reflect the MetroLink project including the current MetroLink Depot location and alignment.

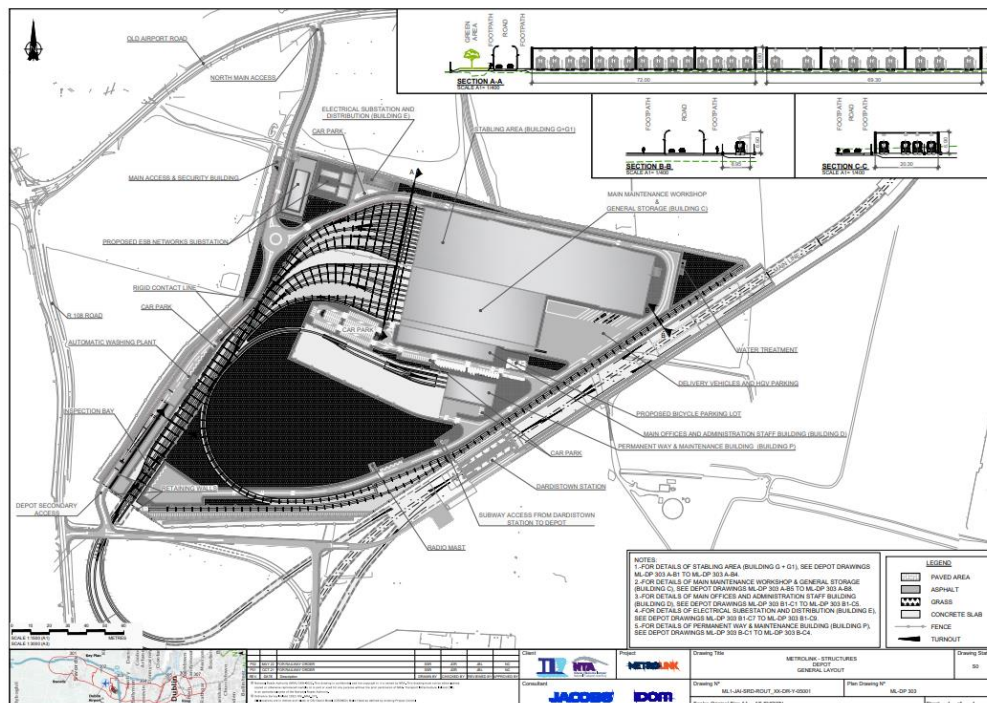


Figure 2: Proposed Site Layout Plan for the Dardistown MetroLink Station and Depot (Drawing Number ML-DP 303 of MetroLink Railway Order Application)

- **Kissing Gates**

The NTA welcomes Policy CMP13 and Objective CMO18 in relation to facilitating pedestrian and cycle routes that are universally accessible and that seeks to remove barriers to active travel movement. It is suggested that the Plan could include a specific objective in relation to kissing gates. Kissing gates will not be supported in future NTA funded projects. These types of gates deny access to public parks and greenways to those using mobility aids and non-standard bicycles. They undermine national and regional policies and investment in active modes of travel. A specific objective that seeks to restrict the use of kissing gates in the future and audit the use of existing kissing gates would ensure national and regional policies can be advanced and investment in active modes of travel is not undermined.

NTA Recommendation

Include a specific objective to commit that FCC will not install kissing gates in the County and will audit existing areas to identify existing kissing gates for removal.

Suggested Objective: The installation of kissing gates will not be permitted both in Council and private developer projects in the Fingal area and an audit will be undertaken to identify existing kissing gates for removal.

- **Car Parking Standards**

The NTA would reiterate its recommendation that parking standards should be based on 'maximum' values rather than 'norm' values.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Fingal Development Plan 2023 – 2029. The NTA would be available to discuss any issues arising from the comments made in this submission.

Yours sincerely,

A handwritten signature in black ink that reads "Michael MacAree". The signature is written in a cursive, flowing style.

Michael MacAree
Head of Strategic Planning