

Planning Department,

South Dublin County Council, County Hall, Tallaght, Dublin 24.

13th January 2022

RE: Planning Application SDZ21A/0022 – Residential Development at Clonburris

Dear Sir/Madam,

The National Transport Authority (the "NTA") has reviewed the subject planning application and, based on the *Transport Strategy for the Greater Dublin Area 2016-2035* (the "Transport Strategy"), wishes to submit the following observations.

1. General Observations

The NTA regard Clonburris as a critical development area for the achievement of higher-density residential development based on accessibility to high-quality metropolitan transport services, and to a range of services at the local level by walking and cycling, such as schools, shops, open space and other supporting facilities.

As such, subject to the local authority's assessment of its compatibility with the *Clonburris SDZ Planning Scheme* (the "Planning Scheme") in relation to density, parking and housing mix, the proposed development is supported by the NTA as being consistent with the Transport Strategy, as it seeks to consolidate development around the DART+ West rail project and will provide added impetus for improved bus services in the medium-long term additional to that being implemented under BusConnects. Furthermore, the mixed use nature of the SDZ and the layout and urban form will promote walking and cycling.

The recommendation below would, in the view of the NTA, enhance the potential for the proposed development to operate in a sustainable manner from a transport point of view.

2. Filtered Permeability

Filtered Permeability is a key measure in promoting sustainable transport use. It is given expression primarily via the provision of a greater level of accessibility for those using walking and cycling as modes of transport compared to those using the private car. In a new development area, such as Clonburris, it is essential that a clear competitive advantage is given to these sustainable modes. The most appropriate method to achieve this is to provide for a greater number of access points for

pedestrians and cyclists than for the private car, and to reduce the number of access points by private car to development blocks to the minimum required.

In preparing the transport elements of the Clonburris SDZ Planning Scheme, in collaboration with SDCC, and in our observations on proposals for the SDZ in the period since the Planning Scheme's adoption, the NTA has consistently recommended that a filtered permeability approach is implemented throughout the plan lands. This is reflected in Figure 2.2.7 of the Planning Scheme – *Overall Movement Concept*.

Figure 2.2.7 shows that the southern development area, subject of this planning application, is to be served by three general traffic accesses with three additional filtered junctions providing access for pedestrians and cyclists only. Similarly, the northern development area was to be served by four general traffic junctions and one filtered junctions.

The NTA notes that there seems to be some inconsistency in the material provided as part of the planning application as it relates to the number of accesses to the southern block, and in turn some inconsistency with the granted Clonburris Southern Link Street. For example, section 10.5.2.1 of the EIAR states that there will be 5 accesses to the development, while figure 10.27 appears to show 6, with the access to Street 4 not highlighted.

NTA Recommendation

In the event that the proposed development is intended to provide for four general traffic access points to the southern housing block, the NTA would be of the view that this would serve to maximise access by private car for six of the seven residential streets, thereby failing to provide an advantage to walking and cycling. As such, the NTA recommends that the direct access from Street 3 is amended to allow for pedestrian and cycle access only, in accordance with the Planning Scheme, or that alternative access arrangements are developed for the southern block.

I trust that the views of the NTA will be taken into account in the assessment of the proposed development.

Yours sincerely,

Michael Mon Ann

Michael MacAree Head of Strategic Planning