

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



Dún Scéine, Lána Fhearchair
Baile Átha Cliath 2, D02 WT20

Dún Scéine, Harcourt Lane
Dublin 2, D02 WT20

t 01 879 8300

info@nationaltransport.ie
www.nationaltransport.ie

5th September 2022

RE: Planning Application SDZ22A/0011 – Primary School 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”), and on the objective of the Clonburris SDZ Planning Scheme to operate in a sustainable manner, wishes to submit the following observations and recommendations.

1. Overview

The NTA have consistently supported the development of the Clonburris SDZ as an exemplar of compact urban development based on accessibility to high-quality existing and proposed public transport, and at a density and with a mix of uses that would facilitate and promote walking and cycling for local trips. The provision of a primary school within the SDZ lands is therefore welcome as another step in the realisation of the overall vision for the Clonburris lands.

The recommendations below are therefore aimed at ensuring that the locational characteristics and the policy context within which the development has been brought forward are built upon in order to maximise the use of sustainable transport modes.

2. Mobility Management Plan

The NTA notes the contents of the Mobility Management Plan (MMP) and while the quality and depth of the background analysis undertaken is noted, the substantive elements of the MMP do not represent an ambitious approach on the part of the applicant, in that it fails to do the following:

- Set medium and long term mode share targets; and
- Commit the applicant to the implementation of the Action Plan’s behavioural change measures.

Instead, the MMP sets out Year 1 targets, which would not be regarded as fully consistent with the vision and objectives of the Transport Strategy or the Planning Scheme, in that the car remains the dominant mode for staff and caters for 45% of student travel. Furthermore the Action Plan sets out a suite of measures for consideration rather than implementation.

NTA Recommendation

The NTA recommends that, in advance of granting permission, the applicant is required to submit a revised MMP with ambitious targets for cycling, walking and public transport for staff and students, and commitments to the implementation of measures that will seek to achieve these.

3. Provision for Cyclists

Linked to the above point, the NTA notes that the MMP and Traffic and Transport Assessment (TTA) states that there will be 46 cycle parking spaces, while drawing no. 1002 shows 72 spaces. This inconsistency needs to be addressed in advance of granting permission. Notwithstanding this error, the cycling proposed is intended to cater for a school population of 584, including staff. 46 spaces would equate to a mode share of c.8%. While the NTA acknowledge that in general across the Dublin area, cycling to primary school would be lower than this at present, the proposed development of Clonburris in a compact urban form, with provision for cyclists built in from the outset, should facilitate a higher mode share for cycling, in particular for the older primary school cohort.

In addition, the cycle parking is proposed to be located in between the 2 internal access roads, meaning children would be required to cross a road to get from their cycle parking to the school. It is also noted that the cycle track and footpath is not carried through the junction of the internal access road.

For staff and pupils travelling along Thomas Omer Way from the east, there is a lack of continuity of cycle facilities. Cyclist would travel southwards along the eastern side of the north-south access road and then be required to negotiate the junction towards the school without facilities. All of these locations are within the red line of the proposed development.

NTA Recommendation

The NTA recommends the following:

- That sufficient cycle parking is provided on site which would cater for at least 20% of staff and 20% of students using this mode;
- That the cycle parking is relocated on site in a manner which ensures full cycling priority from the external road network to the parking and that no roads are required to be crossed by children within the site; and
- A toucan crossing is provided on the north-south road forming the eastern boundary of the site which accommodates cyclists travelling on Thomas Omer Way from the east.

4. Drop-off / Set Down

In terms of drop-off, the NTA's *Safe Routes to School* guidance states that these are not encouraged in close proximity to schools unless there is no safe alternative area for set down within a short walk. The proposed development provides for an unspecified number of set-down car spaces within the campus and on the approach roads – it is noted that both the MMP and TTA refer to set-down on both sides of the access roads, but only 1 section appears on the site layout drawings. The NTA are of the view that providing for a high number of set down spaces will encourage unsustainable travel behaviour.

NTA Recommendation

The NTA recommends that, in advance of a grant of permission, clarity is provided in terms of the quantum of drop-off spaces, its location, and a full justification for both in terms of road safety and promotion of sustainable transport modes.

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

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