

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

12th October 2022

RE: Planning Application SDZ22A/0352 - Construction of two new three storey primary school buildings for Gaelscoil na Camoige agus Gaelscoil Chluain Dolcain, Clondalkin

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

Section 7.1.2 of the Transport Strategy for the Greater Dublin Area sets out Principles of Land Use and Transport Integration.

At the strategic level, the principles include:

‘For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

At the local level, the principles state:

‘that planning at the local level should promote walking, cycling and public transport by maximizing the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools’.

2. Car Parking

Section 2.9 of the ‘Planning Report’ states that 26no. car parking spaces are provided for each new 16 classroom school which is in excess of the South Dublin County Development Plan standards which allow a maximum of 1 space per classroom. It is the view of the NTA that the provision of car parking, in excess of the Development Plan standards, should not be permitted as this serves to facilitate and to encourage travel to/from the school by car.

Car parking should be assessed in terms of the entire shared campus and that the applicant should demonstrate that provision does not exceed the maximum Development Plan standards for all staff and pupils within the combined campus.

Recommendation

The NTA recommends that:

- The number of car parking spaces provided should be reduced to comply with Development Plan standards
- Car parking should be assessed in terms of the entire shared campus and that the applicant should demonstrate that provision does not exceed the maximum Development Plan standards for all staff and pupils within the combined campus.

3. Local Walking and Cycling Network

It is not clear from the material submitted how the local walking and cycle network does, or will as the schools expand, cater for large numbers of children travelling to school in terms of providing safe and attractive infrastructure from their places of residence to the school campus. The NTA notes there are some improvements proposed but there is an absence of a coherent network and that this has not been analysed as part of the application.

Recommendation

The NTA recommends that permission is not granted until a full assessment is undertaken in relation to the cycling and walking infrastructural requirements for the proposed development to operate in a safe and sustainable manner, and a programme agreed for its delivery and funding.

4. Provision for Cyclists

The South Dublin County Development Plan 2022-2028 sets out standards for bicycle parking in Section 12.7.1 and requires the provision of a minimum of '1 per 5 staff' and '1 per 5 students' for schools. Section 2.8 of the Planning Report states that 100 spaces are being provided and that this meets the Development Plan standards equating to provision for approximately 20 staff and 480 students. As also stated in the 'Planning Report' the proposed application is part of a larger shared campus for which a management agreement exists. It is the view of the NTA that, in this regard, cycle parking should be assessed in terms of the entire shared campus and that the applicant should demonstrate that sufficient provision is made to meet the minimum Development Plan standards for all staff and pupils within the combined campus.

All bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011) or any superseding document and in this regard cycle parking should be covered and secure.

The proposed site layout shows the cycle parking located in such a manner that could require pupils to negotiate all of the road, set-down and car parking infrastructure without a clear and segregated route. Vulnerable road users, such as children on bicycles, require a safe route from the public road network to the cycle parking facility and this should be clearly marked.

The NTA supports the provision of the additional 2 no. pedestrian accesses which will provide additional permeability and will encourage travel to/from the school by walking. It is the view of the NTA that these should be 'Pedestrian and Cycle' accesses and should be designed in such a manner as to be safely and efficiently shared by both pedestrians and cyclists.

Recommendations

The NTA recommends the following:

- Cycle parking should be assessed in terms of the entire shared campus and that the applicant should demonstrate that sufficient provision is made to meet the minimum Development Plan standards for all staff and pupils within the combined campus.

- Safe, secure cycle parking should be provided as part of the development of the site. There should be a clear, direct path from the school gates to the cycle parking facility.
- For clarity, bicycle parking should comprise Sheffield-type stands, located 1.2m apart and be covered;
- Cycle parking should also be provided for staff. Welfare facilities such as showers and lockers should be provided to encourage staff to travel by active modes;

5. Drop-off / Set Down

The NTA notes the intention to provide an unspecified number of set-down areas within the school campus. The 'Proposed Road Layout' drawing (8064-2503) identifies these as 'Car & Bus Set Down' Area and they are located along the main access road which also leads to the car parking. Evidence has emerged in recent years that such facilities can cause a number of issues. These are set out in the *Safe Routes to School Design Guide* as follows:

- Set down areas encourage vehicles into the area with the highest intensity of children congregating;
- Set down areas reduce air quality in areas with the highest intensity of children congregating;
- Set down areas reduce the attractiveness of a Park & Stride;
- Research shows set down areas require ongoing enforcement to operate effectively; and
- On-site drop off zones use land that could be used for play/sport/educational buildings.

It is also noted that COS8 Objective 7 of the South Dublin Development Plan states the following: *'To facilitate provision of parking for staff and parents and 'drop-off' areas for new schools, only as part of a mobility management plan, where a need has been demonstrated and where active travel modes (walking and cycling) and public transport have been prioritised having regard to the protection of nearby residential amenity'.*

The NTA are of the view that providing for a high number of set down spaces will encourage unsustainable travel behaviour and that, in this instance, the MMP does not sufficiently demonstrate that active travel modes have been prioritised. Given the size of the proposed school and the proposal that these set down areas are for both buses and cars, the NTA would caution that this drop-off facility may lead to greater traffic and transport issues than it seeks to address.

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.

In the event of a grant of permission, it is recommended that a condition is attached requiring the applicant to monitor the operations of the set-down area annually, in order to ensure the following:

- That conflict between motorists and children on foot and on bicycles does not occur;
- That children living within walking and cycling distance are not being driven to school;
- That the car trips attracted to the facility are not causing operational issues on the local road network, particularly for buses.

In the event that these issues are emerging due to the presence of a dedicated drop-off facility, a mechanism for its removal in future is recommended for inclusion in any grant of permission.

6. Mobility Management Plan

The NTA notes the contents of the Mobility Management Plan (MMP) and is of the view that it needs to address the following:

- Clearly identify current travel patterns including mode share;
- Set medium and long term mode share targets moving towards mode sustainable travel; and
- Commit the applicant to the implementation of the measures identified in the MMP

It is expected that some analysis of existing travel patterns will be provided with an explanation of how they have informed the proposed MMP measures. It appears that such an exercise has not been undertaken. The MMP should set out short and medium term mode share targets, consistent with the vision and objectives of the Transport Strategy, in that this should increase travel by walking, cycling and public transport and reduce car travel for staff and students. Furthermore, the MMP should set out a suite of measures with an implementation plan with associated timeframes.

The NTA would like to take this opportunity to draw the applicant's attention to the following documents published in more recent years:

- i. Toolkit for School Travel;
- ii. Workplace Travel Plans – A Guide for Implementers; and
- iii. Achieving Effective Workplace Travel Plans – A Guide for Local Authorities.

Together these documents provide a comprehensive template for high quality Travel Plans / MMPs based on the experience gained from the Green Schools Travel programme and Smarter Travel Workplaces and Campuses programme. They can inform a revised MMP.

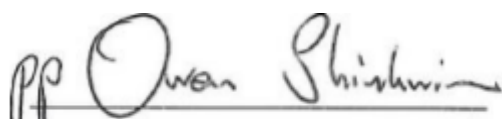
Recommendation

The NTA recommends that a revised MMP is prepared addressing the issues raised about above in particular that:

- Clearly identifies current travel patterns including mode share;
- Sets medium and long term mode share targets moving towards mode sustainable travel; and
- Commits the applicant to the implementation of the Action Plan's behavioural change measures.

I trust that the views of the Authority will be taken into account when considering this application.

Yours sincerely,


Michael MacAree
Head of Strategic Planning