

Dún Scéine,
Iveagh Court,
Harcourt Lane,
Dublin 2,
D02 WT20.

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902.

9th May 2022

Re: Case No. 313220 – ‘Dundrum Village’ Strategic Housing Development at former Dundrum Shopping Centre, Dublin 14.

Dear Sir / Madam,

The National Transport Authority (the “NTA”) has reviewed the above Strategic Housing Development planning application and, based on the *Transport Strategy for the Greater Dublin Area 2016-2035* (the “Transport Strategy”), wishes to submit the following comments.

Site Location and Accessibility

The subject site provides an opportunity to deliver residential development on an infill suburban site, which accords with a key Strategic Planning Principle in the Transport Strategy for the Greater Dublin Area (Section 7.1.2). The site is adjacent to the Dundrum Luas stop and the bus terminus/transport interchange at the north end of Dundrum Main Street as proposed in the New Dublin Area Bus Network, which is a key element of the overall BusConnects programme. In the new bus network, there will be a substantial increase in bus frequency and route options at the terminus/interchange connecting the subject site to more locations across the Dublin metropolitan area than the current network. The site is also within the Major Town Centre of Dundrum, which is a significant employment destination.

The proposed development would increase the number of people living within walking and cycling distance of public transport and a town centre, which is consistent with the Local Planning Principles

contained in the Transport Strategy, and with principles of land use and transport integration that underpin the *National Development Plan* and the *Regional Spatial and Economic Strategy* for the Eastern and Midland Region. The NTA is therefore supportive in principle of the proposed development as it aligns with the Principles of Land Use and Transport Integration set out in the Transport Strategy, and with national and regional planning policy.

BusConnects and Interchange

In September 2020 the NTA published the new BusConnects Dublin Area Bus Network, following three rounds of public consultation. The new network represents a fundamental reorientation of the bus network serving the Dublin area. The current network comprises a range of discrete bus services, many with circuitous routes that provide extensive coverage but often running at relatively low frequencies. In contrast, the new network is characterised by high frequency radial Spine routes, new Orbital routes, a range of standalone radial routes, a number of local routes connecting to the higher frequency routes at nodes in the network, and a limited number of peak time and express services to provide higher capacity at the times of greatest demand.

A fundamental principle of the new network is interchange or transfer, either between buses or between bus and other public transport modes. While transfer can occur across the entire network, a number of locations have been designated as key interchanges owing to the concentration of bus services at those points and, in some cases, their proximity to other public transport stops and stations. One such location is Dundrum, where the NTA is currently progressing the development of an interchange adjacent to the Dundrum Luas stop, as identified in the 2020 bus network. When the phased implementation of the network is complete in 2024, this interchange will be served by the following bus services:

- A2 and A4 Spine;
- S6 Orbital;
- 74, 87 and 88 Radial; and
- L25, L33 and L35 Local.

The first of these services to be introduced will be the L25, which will commence operation in September 2022. To facilitate its implementation, the NTA has been working with Dun Laoghaire-Rathdown County Council (DLRCC) to develop a bus stop and standing space on the Dundrum Bypass, adjacent to the subject site. This location was selected due to its proximity to the Dundrum Luas stop and other bus services, and in order to provide a layover for terminating services and to serve non-terminating services using the bypass. DLRCC has agreed to construct this facility in the coming months on behalf of the NTA, so that it is available for use by September.

Throughout the design development of the subject site the NTA and DLRCC liaised with the applicant, and furnished the applicant with the location and general dimensions required for the bus facility. The finalised layout will be 65 metres long, running southwards from a point c.15 metres south of the junction of Main Street and Dundrum Bypass. A further 15 metres of works are proposed south of the facility, primarily the removal of the existing bollards on the edge of the on-road cycle lane. The 65 metre long facility is shorter than the NTA's initial proposal, which had indicated that consideration should be given to providing for a layby 75-80 metres long. This

reduction in length has been necessitated by the geometry of the bypass following on-site examination. This is the maximum length that is obtainable within the limits of acceptable sight lines. The NTA is satisfied that a 65 metre facility would allow for independent arrival and departure of buses, but no further reduction in length would be permissible. A drawing of the proposed facility on the bypass is attached to this submission.

The NTA has reviewed the drawings submitted with the subject application and notes that the proposed bus facility on the bypass has not been included. A vehicular access that serves the retail element of the subject development at the northern end of the site, which also provides for HGV delivery, has been shown at the location required for the bus facility. The conflict between the bus facility and this proposed vehicular access was raised in discussions between DLRCC, the NTA and the applicant prior to the submission of the planning application. While the NTA is supportive of the applicant's intention to concentrate vehicular access to the site on the bypass, which would reduce traffic volumes on Main Street, the conflict at this location is a matter of some concern to the NTA as it is not clear how the proposed vehicular entrance could be implemented with the bus facility in place.

Section 9 of the applicant's *Transport Assessment* sets out the applicant's summary of the engagement to date and states that 'it has been possible to accommodate a bus lay-by with a length of approximately 29m long' (Section 9.1.5). This proposal is considerably below the space required for the facility.

Section 9.1.10 of the *Transport Assessment* sets out three alternative options for a bus facility. The first is a site immediately to the west of Waldemar Terrace, although this site would be dependent on the closure of the junction of Main Street. While the applicant has stated that such a proposal would be feasible 'If Waldemar is pedestrianised as per DLRCC aspirations', the NTA is not aware of these aspirations at the current time, and no such proposal has been considered in the Area-Based Transport Assessment process that is currently underway for Dundrum and its environs. The other two sites are further south on the bypass and would not fulfil the requirements of a multi-modal transport interchange that all related stops and stations must to be in close proximity to each other.

Section 9.2.1 of the *Transport Assessment* states that 'The applicant is however, very willing to work with the NTA to ensure that public transport infrastructure is delivered in this area.' However, on the basis of the alternatives proposed in Section 9.1.10, it is not clear that satisfactory resolution of this matter could be achieved with the northern site access in place.

The transport interchange at the north end of Dundrum village is a critical element of the new Dublin Area Bus Network. In the short term, the NTA and DLRCC are progressing the implementation of the planned facility on the bypass, which will form part of the overall interchange on its completion in 2024 when the full revised network is operational.

The NTA is willing to work with the applicant to identify an alternative arrangement for this bus facility which would allow for the construction and use of the vehicular access, subject to the alternative arrangement fulfilling the requirements of a transport interchange. As noted, the three

alternative sites proposed by the applicant do not fulfil these needs. Until such time as an alternative layout is agreed, the NTA intends to proceed with the planned facility on the bypass.

Recommendation:

In the event of a grant of planning permission for the subject application, the NTA would welcome a condition that:

- a) requires the applicant to liaise with the NTA and DLRCC to agree an alternative arrangement for the planned bus facility, and
- b) states that the use of the proposed northern vehicular site access would be dependent on the satisfactory resolution of this issue.

Should this matter remain unresolved, the bus facility on the bypass would remain at the current location and a grant of permission for the subject application, specifically regarding the northern vehicular access, would not be aligned with the objectives of the Transport Strategy.

I trust that the views and recommendations of the NTA will be taken into account in the assessment of this application.

Yours sincerely,



Michael Mac Aree

Head of Strategic Planning

