

From: William Lavelle <wlavelle@cllrs.sdublincoco.ie>
Sent: 14 February 2017 18:54
To: National Planning Framework
Subject: Submission on 'Ireland 2040'

Dear Sirs,

I warmly welcome the launch of a public consultation on 'Ireland 2040', Ireland's new National Planning Framework. I note with interest that the launch of the consultation took place in the same week as an announcements from Government a mid-term review of the Government's Capital Programme.

The new 'Ireland 2040' consultation document highlights the stark reality of Ireland's regional development imbalance, stating that *"Dublin will continue to dominate and potentially overheat drawing in more and more of overall national development."* Subsequently, much of the focus of debate on the 'Ireland 2040' document may centre on the need for a more balanced regional development plan for Ireland, with greater investment in urban counter-points to Dublin. Like many people living in Dublin I grew up outside of the Capital, in the West of Ireland in my case. I don't need to be convinced of the need to invest in the other regions. That's a no-brainer. However, I see the 'Ireland 2040' document as also bringing into focus the current infrastructural deficits in the Dublin region.

The results of these deficits can be seen every day in the chronic traffic congestion on Dublin's road network. For example, real-time data shows that traffic on the M50 between the N4 and N7 junctions has increased by 12.6% between 2014 and 2016, up to over 140,000. Anybody who drives the M50 at peak hours won't need figures to know about the scale of congestion; and that's without any accidents. The last TomTom Global Traffic Index ranked Dublin as the joint 2nd most congested city of all cities globally - irrespective of size - when it comes to morning peak congestion. Only Mexico City ranked worst.

Dublin's traffic crisis is detrimental to quality of life and regional competitiveness. But it also acts as a potential blockage to efforts to respond to the current simultaneous housing supply crisis. In spite of all the talk of building in the city, it is highly likely that the bulk of new housing in Dublin which will end-up being delivered by way of large-scale housing developments on suburban greenfield sites close to or outside the M50. Development has already restarted in places such as Adamstown and I predict that we will see a large increase in applications for housing development in West Dublin and along the M50 belt during 2017.

However, with the road network saturated and public transport options limited, serious questions are beginning to be asked about the sustainability of placing further large scale housing development in locations where spare transport capacity simply doesn't exist. For example, there is serious concern over the sustainability, in transport terms, of the proposed new SDZ at Clonburris.

On Friday 10th February 2017, it was announced that An Bord Pleanala had decided to refuse permission for a major proposed expansion to the Liffey Valley Centre: The Bord Pleanala Inspector stated:

"Having regard to the scale and extent of uses proposed, the associated increase in traffic movements to and from the Liffey Valley Shopping Centre, and in the absence of any alternative public transport other than Dublin Bus or meaningful proposals for demand management measures by the applicant, primarily paid parking, the proposed development will have a detrimental impact on the road network. The National Transport Authority and Transport Infrastructure Ireland both raised concerns about the implications of the proposal on the national strategic network. The modelling results for various junctions submitted as a

response to further information clearly demonstrates that critical junctions will operate well above capacity. The effects of such were not fully explored in particular the implications for the M50 and N4 which is critical given the current increasing congestion on the M50. Considering the action identified in the LAP for a Local Access Study, it is considered that in the absence of this study, the proposal would be premature and would have a further detrimental effect on an already overstretched national road network.2

This planning decision highlights the serious deficit in transport infrastructure in West Dublin and will likely be replicated in further refusals unless investment in transport infrastructure is directed to support strategic land-use planning objectives.

The upcoming mid-term review of the Government's Capital Programme presents a timely opportunity for some much-needed policy alignment. Unlike many of the previous iterations of capital spending plans, the Government should seek to build this capital programme around key spatial planning objectives so that investment and planning are fully intertwined. The fact that the new National Planning Framework is being finalised at the same time as the Capital Programme is being reviewed means there should be no excuses

An alignment of capital spending with planning objectives would mean that investment -would be targeted to support the transport and land-use objectives contained in the City and County Development Plans (including servicing areas earmarked for new development) and in the Greater Dublin Transport Strategy published last year by the National Transport Authority. This would mean investing in a Metro link to the airport but more critically it would mean giving the green light to the much-need DART Underground project, which could be funded by a long-term PPP. Dart Underground will be a game-changer for transport in West Dublin and will facilitate future residential development at places like Adamstown and Clonburris where development may otherwise prove unsustainable if reliant solely on a gridlocked road network.

In summary, if investment is not targeted at delivering necessary infrastructure for areas identified for future development, then further development in these areas may be rendered unviable.

William Lavelle

Local Councillor for Lucan & Palmerstown
Fine Gael Leader on South Dublin County Council

36 St. Andrew's Drive, Lucan
087 410 7885
wavelle@cllrs.sdublincoco.ie

facebook/wlavelle
twitter: @LucanCouncillor

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