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8th June 2022

An Bord Pleanála,
Marlborough St.,
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Re: Belcamp SHD

A chairde,

I refer to the above application and wish to make the following observations in relation to the public transport aspects of the development. With the truncated timeframe and the lack of access to pre-planning documentation, I have not had time to consider other aspects of the application.

1. Missing documentation

The “Sustainable Transport Strategy Study” has not been put online. Instead a document in relation to a different planning application entitled “Response to Engineering Items in An Bord Pleanála’s Pre-Application Consultation Opinion Proposed Strategic Housing Development at Auburn, Malahide Road” is online at

https://www.belcampshd.ie/files/ugd/522b33_1c7dd9a01414439c9fd0313d169b7410.pdf

which is the link to which the Sustainable Transport Strategy study directs. (For completeness I attach that document as Appendix 1.)

2. Light rail reservation/alignment

I have recommended for many years that a public transport reservation be provided through this land to facilitate an orbital light rail or metro connection between Clongriffin and the Metro North (now Metrolink) station at Dardistown. This reservation/indicative alignment was included in the draft of the current (2017) Fingal Development Plan when it went on public display in 2016. Unfortunately, it was then removed from the draft before adoption on the foot of advice that such a reservation should be based on detailed analysis.

The issue of this orbital public transport route was then included in the terms of reference for the South Fingal Transport Study carried out by SYSTRA. That Study reached the following conclusions:

Fingal/Dublin Fringe – Dublin Airport – Swords Bus Route

The modelling analysis in the ERM shows there is strong demand for an orbital public transport route running

between Clongriffin, Dublin Airport and Swords with the future land uses assumed for the SFTS. In addition to the bus services proposed by the NTA GDA Strategy, it is recommended that this future orbital connectivity is provided to help reduce car dependency for trips not travelling to the city, but to major employment areas potentially along the R139. It will also serve Dublin Airport and Swords, where large scale future employment generating developments will be driven by MetroLink but will attract trips from the wider areas including from Fingal/Dublin Fringe.

The level of demand suggests a high frequency bus service (every five to ten minutes) would be required to meet peak period demand. However, a relatively direct and reliable service would require the development of the EWLR Clonshaugh section and a link over the M1 to Dublin Airport, either by completing the suggested public transport only link over the M1 Dublin Airport spur interchange, or by providing the full EWLR. The relative costs and benefits of these alternatives would have to be carefully assessed.

However, a review of the NTA GDA Strategy is due to be undertaken by the end of 2022, at which point it would be timely to assess the potential inclusion of the proposed orbital bus service for delivery post 2027.

SFTS Recommendation 24: To further consider the feasibility of a Fingal/Dublin Fringe – Dublin Airport – Swords Bus Route when Bus Connects and MetroLink are more advanced. The current phases of planning for these projects must give priority to those services already identified in the NTA GDA Strategy 2016-2035.

Unfortunately, the GDA Strategy Review didn't really get into the level of detail which the SFTS recommended.

It did however identify in its Transport Strategy Development and Modelling Report that demand levels on the Malahide Road corridor will be appropriate to a light rail service. Therefore, it included a light rail route on the Malahide Road in its draft Strategy.

In addition, it noted the importance of light rail for growth areas including the area of which Belcamp forms a part:

It is recognised that Luas is ideal for serving key growth areas Clonburris, North Fringe, Adamstown, and the Airport and integrates well with Park and Ride. However significant challenges associated with the Luas include achieving the alignments tested and integrating the lines outside the city centre, which could in time require an Orbital system.

(As I can't find the Transport Strategy Development and Modelling Report seems online, I attach it as Appendix 2 to this submission.)

The correct approach to transport-oriented development, of course, is to plan for the public transport link in tandem with the forward planning for the urban development and to provide the public transport link in advance of occupation of the houses.

This residential area is to be subject to a Local Area Plan. I intend to propose that the LAP provides for a light rail/metro reservation/alignment through these lands to form a link between the Malahide Road/ Clongriffin light rail proposal and the Metrolink proposal.

However, an application has been made in advance of the forward planning process, which risks making that process irrelevant.

In these circumstances, the Board, if it is minded to grant the permission, should ensure that it gives effect to the accumulation of policy at national regional and county level which commits the planning system to integrating public transport infrastructure into urban development proposals by means of public transport-oriented development.

This means that the Board should require that the design of the proposed development is such that an orbital section of light rail/metro route can be included in the overall development, whether within the 10-year timeframe of the application, or subsequently.

It would be a serious failure of planning if the Board doesn't ensure that the details of this development do not obstruct the provision of a light rail/metro link serving this area.

Given the importance of light rail in driving a modal shift from car travel to sustainable modes, it would also be a failure of the Board to meet its legal obligations as a planning authority under the Climate Action and Low Carbon Development Act as amended, as it would be permitting a pattern of development undermining or even preventing compliance with the carbon budgets adopted under the Act.

3. No legal basis for a fee

I am paying a fee for this observation under protest. As I have already pointed out, An Bord Pleanála has no statutory authority to require the payment of a fee for the making of an observation on a Strategic Housing Development application.

Best regards,



Cllr. David Healy

Attachments

Appendix 1 Response to Engineering Items in An Bord Pleanála's Pre-Application Consultation Opinion Proposed Strategic Housing Development at Auburn, Malahide Road supplied online at belcampshd.ie instead of a "Sustainable Transport Strategy Study"

Appendix 2 NTA's Transport Strategy Development and Modelling Report for the Greater Dublin Area Transport Strategy Review