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Status: Submitted

Submission:

Transport-oriented development; meaningful assessment of alternatives

Consultation:

Draft Dunsink Urban Area Plan

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Observations:

Title: Luas should be delivered along with housing, not after

Transport-oriented development policies are enshrined in national, regional and Fingal plans and this LAP must follow those policies to be consistent with those plans. In particular, the designation of Dunsink in the EMRA RSES is explicitly dependent on the development of public transport infrastructure to serve the area. The proposal to develop extensive housing in Dunsink long in advance of the light rail line is contrary to the principles of TOD and inconsistent with the Regional Strategy. It will undermine many of the other elements of the LAP.

While the transport assessment refers to years 2030, 2035 and 2042, and assumes the Luas line to be delivered by 2035, the LAP doesn't make any reference to these dates. On the contrary, it refers to the GDA Transport Strategy which identifies the Luas line as a post-2042 strategy. The phasing section of the LAP contains no dates or other explanation as to what short, medium and long-term mean in years.

The Transport Assessment makes it very clear that the early provision of the Luas line will be the only way to provide adequate transport capacity and that without it both the Dart West line and local roads will be over capacity.

It is clear that the bringing forward of the Dunsink development in time from that previously envisaged in the Fingal Development Plan (until the 2026 Variation) means that the Tyrrelstown light rail link also needs to be brought forward from the schedule previously envisaged by NTA. The GDA Transport Strategy is due for revision and will need to be updated accordingly.

Title: Assessment of Alternatives in the Strategic Environmental Assessment process

The assessment of alternatives in the SEA is not meaningful and does not comply with the requirements of the SEA Directive.

One clear set of alternatives which should be assessed is the impact of delivering the light rail line in tandem with a) the first phase, b) the second phase, c) the third phase or d) subsequent to the third phase of development. It

appears that the draft LAP provides for light rail in either c) or d). This isn't actually clear. The proposal for late delivery of the light rail line in the draft LAP should be compared with the alternative of early delivery (i.e. as soon as technically feasible.)

Please see the EPA's guidance on alternatives in SEA https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/SEA-Alternatives-157-Published_web.pdf

Title: Car parking

I strongly welcome the proposals in the draft LAP as regards car parking. They present opportunities for significant economic savings for residents and for major improvements in welfare and the public realm.

Title: Combined light rail and cycle/pedestrian bridge over M50

This proposal, which is consistent with the relevant provisions of the Fingal Development Plan, is very welcome is a vital part of the LAP.

Title: River Road quietway

The alteration of River Road to a quietway with no through motor traffic is very welcome. This requires minimal initial investment and should be implemented as part of, or before, phase 1 of the LAP. Suitable alternative routes for motor traffic already exist and the road design and the use of the road is hostile to people walking or cycling.

Title: Variations should be proposed for the land along the Navan Road between the Travelodge and the Navan Road Parkway railway station and for the land east of Navan Road Parkway railway station and

This land (eccentrically named Dunsink South in this LAP) is zoned "High Technology."

The land to the west of the train station is ideally suited for transport-oriented development and the zoning should be changed to the mixed use Metro Rail Economic Corridor to provide housing as well as employment. (I first proposed this in response to a previous variation; more information is at <https://davidhealy.com/?p=1943>)

The land to the east of the station includes a large area of wetland. The wetland area should have the development zoning removed from it.

These variations should be put on public display.

Documents Attached: No
Boundaries Captured on Map: No