

Town Clerk,
Arklow Town Council,
Avoca River House,
North Quay,
Arklow,
Co Wicklow.

15th February 2011

Dear Sir/ Madam,

Re: Proposed Amendments to the Arklow Town and Environs Development Plan 2011-2017

The National Transport Authority (the Authority) submits the following report on the proposed amendments to the Arklow Town and Environs Development Plan 2011-2017. These comments focus on amendments within the following areas:

- Settlement and Housing Strategy
- Economic Development

Under each policy area, observations are presented in the following order:

- Comments
- Recommendations

In addition to these observations, which can be dealt with as part of the proposed amendments, a number of issues and concerns are reiterated that were previously raised by the Authority, but which are not addressed in the proposed amendments and which, accordingly, raise concerns in relation to their consistency with the draft Transport Strategy.

Population and Housing

Proposed Amendment

Chapter 3 amendments in relation to population targets (Table 3.1, 3.2), predicted housing need (Table 3.3), residential zoning (Table 3.4) and phasing (section 3.3.3).

Comments

In its submission on the draft Arklow Development Plan 2011-2017, the National Transport Authority (hereafter referred to as the Authority) recommended that the development of residential zoned lands be prioritised in a manner which supports the sequential expansion of the town, focused on the town centre. The Authority welcomes the inclusion of a residential phasing scheme in Section 3.2.2 and Table 3.4 in the proposed amendments to the Draft Plan. In particular, the NTA welcomes the inclusion of the objective H5 (amendment) that ensures that *“lands closest to the centre or to existing transport and/or community infrastructure be developed prior to more outlying lands, unless in exceptional circumstances”*.

Section 3.3.3 includes new phasing conditions for the release of development lands. These state that Phase 2 lands are only required for development pre-2017 if:

- *Phase 1 lands don't deliver the quantum of development as envisaged in Table 3.4;*
- *Some barrier impedes the development of Phase 1 lands, that does not affect Phase 2 lands;*
- *Phase 1 lands are not released to the market during the plan period”*

The NTA recommends that an additional condition be included in Section 3.3.3. to strengthen the implementation of Objective H5. This would effectively link the release the Phase 2 lands to the overall housing growth targets for County Wicklow. In the event of a downward revision of County level housing growth targets, the phase 2 lands would not be required for development.

The Regional Planning Guidelines for the Greater Dublin Area assigns significant housing and population growth within the region. This may be revised downward in the short term. In this event, it is likely that the number of new houses required in County Wicklow would be reduced and by association, this would impact on the amount of new houses required in Arklow.

Table 3.3 provides that the number of new residential units required by 2020 is 4,000. This projected level of housing development is high and exceeds the number of units required in Table 4.4C of the Wicklow County Development Plan. The draft NTA Transport Strategy is broadly based on the distribution of housing and population in the RPGs and the GDA County Development Plans. There is a risk to transport investment and development consolidation in the region if planned housing growth in Arklow significantly diverges from that planned for at county and regional level, particularly if regional housing targets in the GDA are revised downward.

Recommendation

The Authority supports the inclusion of a residential phasing scheme and this should be retained in the adopted plan.

The Authority recommends that the phasing scheme be strengthened to reinforce the local authority objective of ensuring that lands closest to the centre or to existing transport and/or community infrastructure are developed prior to outlying lands.

The Authority therefore recommends that Section 3.3.3. be amended in order to strengthen the basis for Objective H5, by adding the following text:

“In addition to this, the release of the Phase 2 lands and the associated quantum of housing units will need to demonstrate consistency with the housing growth targets up to 2016 specified in Table 4.4B of the Wicklow County Development Plan 2010-2016 and any amendment to these growth targets, following any revision RPG growth targets”.

Economic Development

Proposed Amendment

Chapter 6 amendments in relation to availability of zoned lands (Section 6.6(i)) and employment phasing (Section 6.6(i), Table 6.2)

Comments

The Authority supports the development of Arklow as an employment centre for a range of employment types as this is consistent with Regional Planning Guidelines for the GDA and its role as a Large Growth Town II.

In its submission on the draft Arklow Development Plan 2011-2017, the NTA recommended that the zoning objectives E1 and E2 be amended to ensure that employment intensive development is not located on these lands. In general, for employment intensive uses, accessibility by public transport, cycling and walking and location within Arklow Town Centre should be the primary considerations. This criterion has not been referenced in the Draft Development Plan.

The amended Draft Plan introduces a phasing scheme for “business park” type development on the lands zoned E1 and E2. If trip intensive developments are to be located on these lands, the NTA supports the inclusion of an additional condition that provides that any future developments would be subject to the implementation of sustainable transport measures.

Recommendation

The Authority recommends that the following statement be added to the amended Section 6.6:

“Any future development on the E1 and E2 zoned lands should be contingent on the concurrent provision of sustainable transport measures, which renders new employment sites accessible from within local walking and cycling catchments and serviceable by bus-based public transport”.

Issues previously raised but not addressed in the proposed amendments

Car Parking

To be consistent with the NTA's draft Transport Strategy, parking provision in all GDA development plans for new non-residential developments will need to reflect the maximum regional car parking standards set out in the Strategy (see Table 1 below).

Table 1

	Maximum Parking Standards (per floor area unless otherwise specified)	Threshold from and above which standard applies (gross floor space)
Employment, including Offices	1 space per 50m ²	1,500m ²
Food Retail	1 space per 14m ²	1,000m ²
Non Food Retail	1 space per 20m ²	1,000m ²
Cinemas and Conference Facilities	1 space per 5 seats	1,000m ²
Higher and Further Education	1 space per 2 staff + 1 space per 15 students	2,500m ²
Stadia	1 space per 15 seats	1,500 seats

Source: Greater Dublin Area – Draft Transport Strategy 2011-2030

In addition, the level at which maximum standards are set is of great importance. Where they exist, maximum standards are usually applied with varying degrees of constraint, on the basis of defined locational factors such as centrality and public transport accessibility.

The Draft Development Plan does not currently reflect either the above recommended values or the approach to and application of maximum standards, proposed in the Authority's Draft Transport Strategy.

Roads Objectives

The Authority notes the National Road Authority's position as represented in the Managers Report, that it would not be supportive of proposals for a third motorway junction at Lamberton. The Authority supports this position and reiterates that the proposed Lamberton interchange would facilitate the use of the N11/M11 Arklow Bypass by local traffic and as such would not be consistent with the strategic function of the N11/M11 as a national primary route.

Airport Objective

The Authority reiterates its position that Arklow is not an appropriate location for an international airport in that it would be at some remove from any major centre of population and would require airport users to travel significantly longer distances,

compared to a location more proximate to the main concentrations of population within the Greater Dublin Area. Under these circumstances, the large majority of trips generated by such an airport are likely to be far more car dependent and as such, would be inconsistent with the objectives of Smarter Travel and the forthcoming Transport Strategy for the GDA.

Conclusion

I trust that the Authority's recommendations pertaining to the proposed amendments will be addressed and would welcome the opportunity to discuss these, should you have any further questions relating to them. The Authority would also welcome the opportunity to further discuss the issues of outstanding concern, as outlined above.

Yours sincerely,



Hugh Creegan
Director of Transport Planning and Investment