Dear Sir/Madam,

Re. Proposed Amendments to Draft Wicklow County Development Plan

The National Transport Authority (NTA) submits the following report on the proposed amendments to the Draft Wicklow County Development Plan (hereafter referred to as the Draft Plan). These comments focus on amendments within the following policy areas:

- Core Strategy/ Population, Housing and Settlement
- Enterprise and Employment
- Transportation
- Car Parking

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

As the NTA is currently preparing a transport strategy, this submission will be based on existing national land use and transport policy that may have a bearing on the completed transport strategy. In this, the NTA places a critical emphasis on the need for a coherent approach to be taken in the prioritisation of investment in transport infrastructure in relation to the draft RPGs transport policies and objectives, as well as other policy areas such as settlement and economic development. The comments are based on the general objectives of the NTA as set out in Section 10 of the Dublin Transport Authority Act 2008 as amended, where the authority is required to seek the following objectives:

(a) the development of an integrated transport system which contributes to environmental sustainability and social cohesion and promotes economic progress,

(b) the provision of a well-functioning, attractive, integrated and safe public transport system for all users,

(c) improved access to the transport system and, in particular, to public passenger transport services by persons with disabilities,

(d) increased use of the public transport system,

(e) regulated competition in the provision or licensed public bus passengers services in the public interest,

(f) the objectives set out in Section 9 of the Act of 2003 (taxi regulation),

(g) increased recourse to cycling and walking as means of transport, and
Core Strategy/ Population, Housing and Settlement (Chapter 3/4)
Amendments 1, 2

Comments
It is noted that the population target for the County (Table 4.2E) has been adjusted downwards which brings it into line with the draft RPG for the GDA. In response to a lower population target, the “headroom in towns” figure has been adjusted upward in Amendment 2 from 11% to 12% in 2016 and from 15% to 23% in 2022. It is stated in the Manager’s Report on submissions to the Draft Plan that “the excess is required because it is extremely unlikely and in fact statistically impossible that every one of these 21 towns will reach their precise population target set out for 2016, due to infrastructural capacities, market factors, and the changing attractiveness of different towns at different times”. According to the Manager’s report, the Draft Plan has already zoned headroom and there is capacity for “30% more growth than is required”. The “headroom for towns” figure is in addition to the zoning headroom provided for in the Draft Plan.

This headroom policy has implications for the scale and location of development across the 21 towns, in the Draft Plan. This policy would likely result in a distribution of population growth which is not “…weighted towards the large growth towns…” as required under SR3 of the Regional Planning Guidelines (RPG) 2010-2022 (p.75). It is considered that it could also result in the over zoning of land in lower order settlements, thus potentially undermining the RPGs SR4, which states that “towns and lands outside of key priority locations shall be managed through phasing policies...to ensure that limited amounts over a longer time period are developed to allow for natural increase and local needs”.

To illustrate this point, the Draft Plan distributes a significant quantity of the 2006-2016 population growth targets to smaller settlements such as Dunlavin (123%), Rathdrum (96%), Roundwood (93%) etc. It is highly improbable that the population growth targets for any of these towns could be achieved through natural increase and local needs up to 2016. In addition, there is a risk that the basis for development consolidation into higher order settlements could be undermined by the scale of growth targeted for smaller settlements. This issue is exacerbated by the “headroom for towns” figure and further exacerbated by Amendment 2, which increases the “headroom for towns” figure for 2016 and 2022.

To conclude, the NTA is seriously concerned with the use of the “headroom in towns” figure and its increase as proposed by Amendment 2 as it not consistent with the objectives of the RPGs which state that “Distribution of future population should be directed towards the upper 4 tiers in the (RPG) hierarchy” (i.e. excluding Moderate Growth Towns, Small Towns and Villages) and “Town in the lower tiers should grow at a sustainable scale in line with natural increase...”.

It is stated in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas that “the development plan should identify where practicable the sequential and coordinated manner in which zoned lands will be
developed...with undeveloped lands closest to the core and public transport routes being given preference" (p.8, 2.3). However, there is no objective in the Draft Plan which provides for the phasing of zoned development land in the Draft Plan. The NTA would emphasise the importance of linking the phasing of zoned development land to public transport, walking and cycling accessibility and proximity to local services.

Amendment 1 presents a core strategy for the Draft Plan period. However, it is noted that this does not include details on the size of the areas zoned for residential development or mixed use including residential. This information had been provided in Table 4.3E but will be deleted as proposed by Amendment 2. The Planning and Development (Amendment) Bill 2009 states that “a core strategy shall in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses, provide details of the size of the area in hectares”.

Recommendation
The “headroom in towns” figure in Table 4.3 should not be included. The distribution of population should be recalculated downwards with the bulk of the downward population adjustment focussed on lower order settlements and rural areas.

The Draft Plan should specify criteria to guide the phasing of zoned development land, related to relative levels of accessibility by public transport, walking and cycling and proximity to local services.

The core strategy should incorporate details of the size of the existing zoned land area in Wicklow in hectares.

Enterprise and Employment (Chapter 7) – Amendment 14

Comment
Amendment 14 has added a new objective (Emp 13) to provide for employment development at nine rural locations throughout the county. Six of these are located adjacent to three interchanges on the M11. All these locations are located outside of areas specified as growth centres in the Draft Plan and, therefore, could undermine the role of the higher order centres within the County as the preferred location for employment growth.

The NTA would not support the provision for large-scale employment development on lands adjacent to strategic road interchanges and outside of the development boundaries of designated growth settlements. The NTA would therefore recommend against the proposed new employment zoning adjacent to the M11/N11 at the Killoughter, Kilpedder and Kilmurray interchanges. Development of these lands would also run contrary the RPG objective of “consolidated and sustainable ... towns” and “supporting high quality public transport”, it would be highly car dependant and would run contrary to the policy direction of Smarter Travel, which includes a statement that, “the integration of existing and future
business parks with public transport and their location within walking and cycling distance of residential areas is an important element in the Government’s industrial property strategy”.

Recommendation
The NTA recommends against the zoning of lands adjacent to the M11/N11 Killoughter, Kilpedder and Kilmurray interchanges.

The NTA recommends that there should be a presumption in the Draft Plan against the zoning of lands for employment outside of specified growth areas in Wicklow for non-rural based industries.

Transportation (Chapter 11) – Amendment 34

Comment
Amendment number 34 changes all references in the chapter from the “DTO” to the NTA”. Related to this amendment, it is recommended that a number of additional amendments be included in the Draft Plan to reflect the role of the NTA in future transport provision in Wicklow. The Draft Plan proposes a number of road and public transport projects for Wicklow during the plan period and in the longer term. Some of these proposals are currently being assessed as part of the NTA Strategy, as specified by Section 12 of the Dublin Transport Authority Act 2008. To ensure that proposals meet national policy, each road infrastructure and public transport project will be considered by the NTA:
  o against economic, environmental and social criteria (these will be specified in the NTA Strategy)
  o as part of future strategy implementation plans, or
  o on a case-by-case basis, as they proceed through the planning process.

Under Section 13 of the Dublin Transport Authority Act 2008, the NTA is required to make an integrated implementation plan within 9 months of the approval by the Minister of Transport of the NTA Transport Strategy. This will have regard to the Transport Strategy that will have been adopted and will reflect the need to ensure the most beneficial, effective and efficient use of exchequer resources. This will then be followed by the preparation of a Strategic Traffic Management Plan.

Furthermore, under Section 65 of the Act, each local authority is required to prepare a ‘Local Traffic Plan’ for its functional area. This must be consistent with the Strategic Traffic Management plan to be produced by the NTA (Section 64 of DTA Act 2008).

It is the view of the NTA that the Development Plan should refer to the role of the NTA Strategy, in relation to identifying the requirements for new road schemes or road improvements. This could be reflected in a Development Plan objective as follows:
Review, and set out an implementation plan, for all road schemes as part of a 'local traffic plan' to be prepared following the publication of the NTA Transport Strategy for the GDA.

The NTA supports the amendments to cycle parking standards (Amendment 41, Table 11.3) as they are consistent with Table A6.4 of the draft NTA National Cycle Manual.

Recommendation
The Draft Plan should reflect the role of the NTA in the formulation of the Strategy within which transport infrastructure is developed.

The Development Plan should include the following objective:
Review, and set out an implementation plan, for all road schemes as part of a 'local traffic plan' to be prepared following the publication of the NTA Transport Strategy for the GDA.

Car Parking – Amendments 38, 41

Comment
It is recognised in Section 11.5 of the Draft Plan that the control of car parking is a key transport demand management measure which can influence travel behaviour in Wicklow. It also has a critical influence on traffic management and the design of new developments and the allocation/design of space in urban areas.

Amendment 41 of the Draft Plan (Table 11.2) proposes minor changes to retail car parking standards. Amendment 38 proposes that “in locations where public transport and parking enforcement are available…. the car parking standards shall be taken as maximum standards…. and where public transport and parking enforcement are not available the car parking standards…shall be taken as minimum standards”. The NTA recommends that the provision for minimum car parking standards should be deleted from the Draft Plan.

The level at which maximum standards are set is also of great importance. Where they exist, maximum standards are usually applied with varying degrees of constraint, on the basis of defined location factors such as centrality (for example, town centre location) and public transport accessibility (taking into account proximity and levels of service, interconnectivity between services/networks). Related to these attributes, the application of parking standards would normally vary inversely with density.

The Greater Dublin Demand Management Study (GDDMS) recommends that parking provision for new developments should not exceed the maximum standards set out in the Appendix to this document (Table 6.2). The car parking standards in the Draft Plan exceed these maximum standards.
Recommendation

The NTA recommends that the provision for minimum car parking standards should not be included in the Draft Plan. The NTA recommends that maximum standards be applied with varying degrees of constraint, on the basis of defined location characteristics such as centrality (for example, town centre locations), public transport accessibility (taking into account proximity and levels of service, interconnectivity between services/networks).

In locations where the highest intensity of development occurs (e.g. the town centres), an approach that restricts car parking to a maximum number of spaces on an area-wide basis may also need to be considered, in the interests of controlling congestion whilst continuing to maximise development potential.

The Greater Dublin Demand Management Study (GDDMS) recommends that parking provision for new developments should not exceed the maximum standards set out in Figure 1 below (Table 6.2). It is recommended that the car parking standards in the draft Development Plan be amended to reflect the maximum regional parking standards for non-residential uses, proposed in the GDDMS. For example, the Draft Plan specifies a maximum car parking standard for office developments of 1 space per 20/25 gross floor area would imply a high car mode share for future employees.

The GDDMS recommends a maximum car-parking standard for office developments of 1 space per 50 gsqm. In such cases, the implementation of mobility management measures are seen as complementary and necessary to the feasibility of applying this standard.

Figure 1: Greater Dublin Demand Management Study (DTO, p55)

Table 6.2: Proposed Maximum Regional Parking Standards (non residential use)

| Employment, including offices | 1 space per 50 m² | 1,500 m² |
| Food retail | 1 space per 14m² | 1,000 m² |
| Non food retail | 1 space per 20 m² | 1,000 m² |
| Cinemas and conference facilities | 1 space per 3 seats | 1,000 m² |
| Higher and further education | 1 space per 2 staff + 1 space per 15 students | 2,500 m² |

Yours sincerely,

[Signature]

Gerry Murphy
Chief Executive Officer

1 The GDDMS can be viewed at the following web address: http://www.dto.ie/web2006/TDMS.pdf.