

Mr B. O’Gorman
Town Clerk,
Athy Town Council
Rathstewart,
Athy,
Co. Kildare

3rd June 2011

Re. Draft Athy Development Plan 2012-2018

Dear Mr O’Gorman,

The National Transport Authority (the “Authority”) submits the following comments on the Draft Athy Development Plan 2012-2018 (hereafter referred to as the Draft Plan). These comments focus on the following policy areas:

- Core Strategy
- Economic Strategy
- Housing
- Movement and Transport
- Car Parking

As you will be aware, the Dublin Transport Authority Act, 2008 (as amended) requires that the Authority considers draft Development Plans in terms of their consistency with the Authority’s Transport Strategy for the GDA. The Authority is currently in the process of finalising its Transport Strategy for submission to the Minister of Transport, Sport and Tourism for approval. This submission will be based on the Draft NTA Transport Strategy, and within the policy framework of existing national land use and transport policy. In this, the Authority 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 RPGs transport policies and objectives, as well as other policy areas such as settlement and economic development.

The Authority recommends that in addition to the specific comments set out below, that the review of the Draft Athy Development Plan should take into consideration the policies and measures set out in the preliminary draft NTA Strategy, in particular those set out in Chapter 8 – Planning for Sustainable Living.

Core Strategy (Chapter 2)

The Authority notes that the population and employment projections used in the Core Strategy are in line with those set out in the Kildare County Development Plan (2011-2017), and the Regional Planning Guidelines for the Greater Dublin Area (2010-2022).

The Authority would raise concerns over the fact that Athy is significantly overzoned for residential development¹ in the draft plan. The draft plan/core strategy needs to fully address this issue, and should set out a mechanism for the sustainable build out of the zoned land within the timeframe of the development plan. This is particularly important in the context of any potential downward revision of population projections by the DoEHLG following the publication of the Census 2011.

The Authority suggests that a policy of sequential development for residentially zoned land be included in the Core Strategy. This should favour the development of brownfield sites, and areas contiguous to the existing built up area in the first instance. It should also state that the sequencing of new residential development in Athy should be directly linked to accessibility to key destinations. In other words priority given to areas which can best facilitate walking and cycling to employment, education and services (including interurban bus stops and the railway station) at a local level.

Economic Strategy (Chapter 3)

The Draft Plan identifies a requirement for an additional 1,201 jobs in Athy. The calculations set out in Table 3.3 of the Draft Plan (Chp 3 pg. 26) state that 12.01 hectares of zoned employment land (using 0.4 plot ratio and 40m² per employee) would be required to accommodate this growth. Currently there is 57ha of lands zoned for employment purposes undeveloped in Athy, excluding town centre, retail or leisure and amenity uses which would also facilitate additional employment.

The Authority would recommend, notwithstanding the need to facilitate different types of employment with different functional requirements, that the Draft Plan sets out criteria to guide the phasing of employment zoned land. The Authority would reiterate the importance of linking the location and sequencing of new development to transport accessibility at a strategic level, and walking and cycling accessibility at the local level.

¹ Draft Athy Development Plan Chp2, p18

Housing (Chapter 4)

The Authority supports the overall policies on encouraging 'higher residential densities in the town centre, and on 'brownfield' and infill sites close to existing/potential connections to public transport' set out in the Draft Plan. The Authority would suggest that the Draft Plan should also take into account the requirement for good pedestrian and cycle links between new residential developments and key destinations within Athy, as a stated policy of the Development Plan.

Movement and Transport (Chapter 7)

Under Section 65 of the Dublin Transport Authority Act 2008, 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 on completion of the Transport Strategy.

It is the view of the Authority that the Draft Plan should refer directly to the local authority's requirements under Section 65 of the Act. The Authority also recommends that this section identifies the role of the '*Local Traffic Plan*' in relation to the identification of, and requirement for, walking and cycling routes, new road schemes or improvements to existing roads, and the location and usage of car parking within Athy. These plans will play a key role in the funding and prioritisation of strategic and local transport interventions in the GDA.

Car Parking (Chapter 15)

The control of car parking is a key transport demand management measure which can influence travel behaviour in Athy Town. It also has a critical influence on traffic management and the design of new developments and the allocation/design of space in urban areas. The Authority suggests that the role of parking as a transport demand management measure should be acknowledged in the Draft Plan.

The Draft Plan states that 'car parking provision shall normally be provided within the curtilage of the development site'(Chp15 pg. 198). The Authority considers that this puts an onus on developers to provide on-site car parking for every new development, where possible. This may affect an inefficient use of land, particularly within the built up area of Athy, and also facilitate the role of the private car to maintain a dominant position as the primary transport mode within the town.

The Authority recommends that this statement should be clarified in the Draft Plan, and that the requirement for new development car parking should be considered in the context of the wider area, taking into account the potential for shared parking spaces which could serve a number of developments, or edge of centre communal

car parking to serve the area as a whole. The potential for shared car parking spaces, or communal car parking should be considered in the context of a local traffic plan for Athy (as set out above).

The Authority welcomes the inclusion of maximum car parking standards in the Draft Plan (Chp 15, Table 15.9) for destination developments (shops / offices etc.). However, the Authority considers that the level at which the maximum standards have been set in the Draft Plan are not stringent enough. The Draft NTA Transport Strategy recommends that parking provision for certain land uses should not exceed the maximum standards set out in Strategy Measure LU4 (see extracted text below). The Authority recommends that the parking standards set out in the Draft Plan are amended to reflect the proposed Regional Maximum Parking Standards.

Measure LU4:

All non-residential development proposals in the GDA should be subject to maximum parking standards. Table 1 shows a number of these land uses and sets out regional maximum standards which should apply to them.

Table 8.1: Proposed Regional Maximum Parking Standards (for certain land uses)

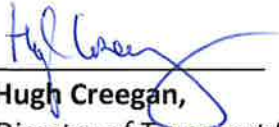
Employment, including Offices	1 space per 50m ²	1,500m ²
Food Retail	1 space per 14m ²	1,000m ²
Non Food Retail	1 space per 20m ²	1,000m ²
Cinemas and Conference Facilities	1 space per 5 seats	1,000m ²
Higher and Further Education	1 space per 2 staff +1 space per 15 students	2,500m ²
Stadia	1 space per 15 seats	1,500 seats

- *While the above table provides a regional maximum standard, significantly more restrictive provision should apply in Dublin City, Designated Towns centres and in areas of good public transport accessibility.*
- *In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.*
- *While the above table represents regional maximum parking standards, the Authority will publish guidance on more restrictive car parking standards appropriate for specific locations, or types of locations, in the GDA, where good quality public transport alternatives are available.*

Conclusion

It is the view of the Authority that the issues outlined in this letter will need to be addressed by the Development Plan to ensure consistency with both the Regional Planning Guidelines and the Authority's forthcoming Transport Strategy for the region. The Authority would be happy to expand on the issues raised, if required.

Yours sincerely,



Hugh Creegan,

Director of Transport Planning and Investment.