Senior Executive Officer,
Development Plan 2011 – 2017
Planning Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin.

14th June 2010

Dear Sir/Madam,

Re. Draft Fingal County Development Plan 2011-2017

The National Transport Authority (NTA) submits the following report on the Draft Fingal County Development Plan 2011-2017 (hereafter referred to as the Draft Plan). These comments focus on the following policy areas:

- Core Strategy/ Settlement Strategy
- Rural Housing
- Enterprise and Employment
- Retail
- Transportation
- Parking

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

An summary of recommendations is provided at the end of this submission.

Section 31C(1) of the Dublin Transport Authority Act 2008 assigns the NTA\(^1\) a role in the making of a development plan. Where a notice is received by the DTA under section 12(1) it shall, as part of any written submission on the draft development plan, state whether, in its view, the draft development plan is:

(a) consistent with its transport strategy, or

(b) not consistent with its transport strategy and in such case what amendments to the draft plan it considers necessary to achieve such consistency.

As the NTA is currently preparing a transport strategy, this submission is 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

\(^1\) As amended by section 30(C) of the Public Transport Regulation Act 2008
set out in section 10 of the Dublin Transport Authority Act 2008 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) increased recourse to cycling and walking as means of transport, and
(f) value for money.

Core Strategy/ Settlement Strategy

Comment

As a general objective, the NTA favours the creation of a well balanced and well functioning settlement hierarchy, where development is consolidated at the appropriate scale and related in turn to a reduced need to travel, reduced car dependency and the availability of public transport as a feasible and attractive mode choice for trip making within urban centres and within the City Region in general.

The NTA supports the allocation of 85% of Fingal’s population growth into the Metropolitan Area. This is seen as being critical for the viability of key strategic transport infrastructure and other areas of service provision. It is also seen as being consistent with the objectives set out in the Department of Transport’s Smarter Travel (A Sustainable Transport Future) policy document as it relates to the need for future population and employment growth to “predominantly take place in sustainable compact urban areas ... which discourage dispersed development and long commuting” and encouraging “smarter travel, including focusing population and employment growth predominantly in larger urban centres ...”.

Essentially, it is critical that population and employment growth be concentrated at an appropriate scale within the catchment area of public transport and other services required at the local level. This offers the best potential for the services to function viably and economically. If there is a reduction in population growth, even in the short term, it is especially important that the growth be consolidated into key centres, well served by public transport.

The prioritised phasing of development, to, for example, manage housing growth where there is a surplus of land zoned for housing, would also support the consolidation of development and the population targets set down in the Draft RPG. In this regard, 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 are no criteria specified in the Draft Plan to guide the phasing of zoned development land. 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.
Recommendation

The NTA recommend that a key objective of the development plan should be to ensure that the settlement hierarchy, key employment sites and retail hierarchy are closely aligned.

The Draft Plan should specify criteria to guide the phasing of zoned development land.

Rural Housing

Comment

The NTA recognise the requirement of the Fingal Development Plan to facilitate the provision of a limited supply of rural housing in the county. However, this should be minimised and should not provide for urban generated housing outside of the designated settlements in either the Metropolitan or Hinterlands areas.

In addition to the challenges identified in the draft plan (p.260), the NTA would emphasise the resource problems that arise from the need to provide supporting transport infrastructure in rural areas, the inability to provide effective public transport services and the facilitation of walking and cycling as viable alternative mode choices to the private car.

Recommendation

The NTA recommend that in relation to rural housing demand, the Development Plan reflects the significant constraints (financial, infrastructural, etc.) in linking dispersed housing development to services at a localised level, and in particular, the problems of providing public transport services in these areas. This is a key reason for moderating development in rural areas and for focusing growth into designated centres, which facilitates the development of a critical mass of population in urban centres, which, among other benefits, can provide the basis for viable public transport services.

Enterprise and Employment – Development at Hedgestown motorway interchange

Comment

The NTA recognises the strategic importance of certain locations in Fingal as focal points for employment growth, particularly the Airport, and the potential for employment development at high densities to occur at other locations along the Metro North corridor.

In this regard, the NTA welcomes the Draft Plan’s commitment to ‘Smart Growth’, and the key principles of ‘mixed use development, public transport orientated and compact development’ (p.53). The NTA would reiterate the need to closely link employment and retail development, to the settlement hierarchy.

The NTA does not support the provision for large scale employment development on lands adjacent to strategic road interchanges. In this regard, the NTA is very concerned that the
Draft Plan provides for large scale employment development on zoned lands adjacent to the M1 motorway interchange at Hedgestown (north of Lusk). Of particular concern is:

- the inclusion of land zoned for ‘High Technology’, which could facilitate large-scale, trip intensive, office development, and
- the increase in the amount of land zoned for ‘General Employment’.

The area in question has no existing or planned public transport, and is not associated with any existing or proposed urban centre. Development of the zoned lands at the ‘Hedgestown’ interchange would therefore be highly dependant on private car trips, and would run contrary to the Draft Plan’s commitment to ‘Smart Growth’, sequential development and 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**

Land zoning which permits the development of high trip generating land uses should not be located at interchanges on the strategic road network, particularly at locations not served by public transport.

The NTA recommends against the current zoning of lands designated as ‘High Technology’ and ‘General Employment’ at the M1 Motorway interchange at Hedgestown.

**Retail – Designation of Balbriggan as a Major Town Centre**

**Comment**

The NTA would agree with the Draft Plan’s conclusion that ‘The requirements for additional (retail) floorspace is predicated on a number of factors including population growth, economic buoyancy and rising consumer demand...’ and that ‘...It is incumbent that the Development Plan recognises and reflects prevailing circumstances underpinning floorspace projections and adopts a pragmatic approach when and where changes occur’ (p.66).

As already stated, the retail hierarchy should be linked to the settlement hierarchy to ensure the growth of major trip attractors such as retail, are developed in the right locations and at an appropriate scale. This would support the role of public transport, and also promote the potential for increased walking and cycling trips, in line with the policy direction of Smarter Travel (A Sustainable Transport Future).

The NTA does not agree that Balbriggan should be provided with the same ‘Major Town Centre’ (MC) zoning as that provided in the two higher order settlements of Swords and Blanchardstown. Whilst the actual scale of retail development locating in Balbriggan may be significantly less than that in either Swords or Blanchardstown, and noting the role of Balbriggan as the main service centre in the north of the county, the zoning objective should nonetheless be guided by and be consistent with Balbriggan’s status in the RPG settlement hierarchy (Large Growth Town II) and the RPG Retail Strategy (Level 3 service centre).
Recommendation

In the interests of maintaining a balance in the distribution and scale of retail centres at both regional and county level, and taking into account the potential impact major town centre scaled development could have on Swords, as the designated Level 2 retail centre, the NTA would recommend that the zoning of Balbriggan centre be changed to ‘Town Centre’ (TC). This reflects more closely, Balbriggan’s function, as specified in the Draft RPG and Retail Planning Strategy (Large Growth Town II, Level 3 centre).

Transportation

Comment

The NTA welcomes the ‘statement of policy’ in the Draft Plan, which commits to integrating land use with a high quality, sustainable transport system that prioritises public transport, cycling and walking (p.92).

When completed, the NTA Transport Strategy will provide an Implementation Plan for the build out of strategic transport, including road construction and improvements in the GDA. This will reflect input from the Department of Transport, the National Roads Authority and Local Authorities. The Draft Plan provides for an extensive road building programme (road improvement schemes) over the period of the Development Plan. Some of these proposals are currently being assessed as part of the NTA Strategy. To ensure that such proposals meet national policy objectives, as specified under Section 12 of the Dublin Transport Authority Act 2008. Each proposal will be considered by the NTA,

- Against economic, environmental and social criteria, as specified in the NTA Strategy;
- As part of future strategy implementation plans; or
- On a case-by-case basis, as they proceed through the planning process.

Under Section 13 of the DTA Act 2008, the NTA is also required to make an Integrated Implementation Plan within 9 months of the approval of the NTA Transport Strategy and under Section 64 of the Act, to prepare a strategic traffic management plan. This will have regard to road infrastructure and public transport proposals and reflect the need to ensure the most beneficial, effective and efficient use of Exchequer resources.

Furthermore, 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 (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 requirement for new road schemes or road improvements.
**Recommendation**

The preparation of a ‘local traffic plan’ for the County (as referred to above) and the need for it to be consistent with the NTA’s Strategic Traffic Management Plan should be included as a **stated objective** of the Development Plan.

Related to this, it is the NTA’s view that transport objective TO71 (p.114), which commits to the implementation of road improvement schemes set out in Table TO4 (p.114), is premature in light of the local authority’s statutory requirement under Section 65 of the DTA Act. The NTA would therefore recommend that objective TO71 be replaced with a statement that reflects this, for example:

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Review, and set out an implementation plan for the road schemes in Table TO4, as part of a ‘local traffic plan’, to be prepared following the publication of the NTA Transport Strategy for the GDA.
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**Parking**

**Comment**

The supply and management of parking is central to the management of transport demand. It has a critical influence on mode choice for trip generating uses such as office, retail and education. 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 control of car parking is therefore a key demand management measure to influence travel behaviour in Fingal. Whilst the NTA acknowledge the footnotes in relation to tables TO3a & TO3b (p.109) which state that developments located within the vicinity of public transport can operate with less parking, which will be determined on merit by the Planning Authority, the NTA would nonetheless **strongly** recommend that car parking standards are set as **maxima** in the Development Plan.

The level at which maximum parking 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 locations) 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 Area Demand Management Study recommended that parking provision for new developments should not exceed the maximum standards set out in the following table:
<table>
<thead>
<tr>
<th>Employment, including offices</th>
<th>1 space per 50 m²</th>
<th>1,500 m²</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food retail</td>
<td>1 space per 14 m²</td>
<td>1,000 m²</td>
</tr>
<tr>
<td>Non food retail</td>
<td>1 space per 20 m²</td>
<td>1,000 m²</td>
</tr>
<tr>
<td>Cinemas and conference facilities</td>
<td>1 space per 5 seats</td>
<td>1,000 m²</td>
</tr>
<tr>
<td>Higher and further education</td>
<td>1 space per 2 staff + 1 space per 15 students</td>
<td>2,500 m²</td>
</tr>
<tr>
<td>Stadia</td>
<td>1 space per 15 seats</td>
<td>1,500 seats</td>
</tr>
</tbody>
</table>

**Recommendation**

The NTA recommends that Development Plan car parking standards for the County place greater emphasis on the locational characteristics of future development. This could take the approach of a more spatially defined (zonal) designation of parking standards, such as in Dublin City Council. This will take into account the location of development in relation to existing and future public transport, and other services such as town or district centres, where alternatives modes to the private car are more readily available.

**Summary of Recommendations**

A key objective of the Development Plan should be to ensure that the settlement hierarchy, key employment sites and retail hierarchy are closely aligned.

The Draft Plan should specify criteria to guide the phasing of zoned development land.

The Development Plan should reflect the significant constraints in providing public transport and other services in rural areas.

Land zoning which permits the development of high trip generating land uses should not be located at interchanges on the strategic road network, particularly at locations not served by public transport. The NTA would recommend against the current zoning of lands designated as ‘High Technology’ and ‘General Employment’ at the M1 Motorway inter change at Hedgestown.

The NTA would recommend that the zoning of Balbriggan centre be changed to ‘Town Centre’. This reflects more closely its function as a Large Growth Town II and Level 3 centre.

The development plan should have a stated objective which reflects the County’s statutory requirements under the Dublin Transport Authority Act 2008.

The preparation of a ‘local traffic plan’ for the County and the need for it to be consistent with the NTA’s Strategic Traffic Management Plan should be included as a stated objective of the Development Plan.

Car parking standards should be set out as maxima in the development plan.
Car parking standards should place greater emphasis on the locational characteristics of future development. A more spatially defined (zonal) designation of parking standards, such as those used by Dublin City Council, should be considered.

Yours Sincerely

Gerry Murphy  
Chief Executive Officer