Administrative Officer
Planning Department
Kildare County Council
Áras Chill Dara,
Naas,
Co. Kildare

25th June 2010

Dear Sir/Madam,

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

- Core Strategy/ Settlement Strategy
- Transportation
- Parking
- Retail

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

A summary of the recommendations are included 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 NTA 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 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:

\(^1\) As amended by section 30(C) of the Public Transport Regulation Act 2009
(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
(h) value for money.

Core Strategy/ Settlement Strategy (Chapter 2/3)

Comment

The housing and population allocation in the Draft Plan (Ch 3, Section 3.5) is consistent with the housing and population allocation set down in the draft Regional Planning Guidelines for the GDA (Draft RPG).

The prioritised phasing of development (to manage housing growth where there is a surplus of land zoned for housing) will support the consolidation of development and the population targets set down by the Draft RPG.

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). The NTA notes that 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.

The Draft Plan distributes significant population growth (15,133) over the period 2006-2017 into “dispersed rural areas” (15%) and into “small towns/ villages/ rural settlements/ rural nodes” (15%).

The NTA recognises the requirement of the Plan to facilitate a limited supply of rural housing in the county. There is a necessity, however, to control sporadic development in rural and remote locations, to maintain a clear distinction between urban and rural areas and that all urban generated housing is directed to existing settlements through a strongly plan-led process. A continuation of the current rate of single house completions in rural areas would place an unsustainable burden on
the state for the provision of public services that would in any case be more effectively provided to a more urban-based population.

**Recommendation**

The Draft Plan should specify the 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.

It is recommended that the Draft Plan reflect the significant constraints in providing public transport to rural and peri-urban areas. The Draft Plan should highlight this as among the key reasons for the need to control development in rural areas, and for focusing growth into higher order centres, which will facilitate the development of a critical mass of population that can support the viability of providing effective public transport.

**Transportation (Chapter 6)**

**Comment**

The NTA supports the policies contained in the Draft Plan that:

- commit to the integration of land use and transportation (Chapter 6, Section 6.1),
- support national policy, including Smarter Travel and the National Cycle Policy Framework (Chapter 6, Section 6.2, 6.3),
- promote travel demand initiatives to “influence people’s travel behaviour towards more sustainable options”(Chapter 6, Section 6.3.2),
- commit to prepare Traffic Management Plans for urban areas and an integrated transportation strategy for Kildare in conjunction with the NTA (Objective GT2/GT7, Chapter 6, Section 6.5.1), and
- ensure that all new developments are accessible to sustainable modes of transport (Objective GT8, Chapter 6, Section 6.5.1).

The Draft Plan proposes an extensive road building programme and a number of public transport projects for Kildare during the Plan period and over 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:

- against economic, environmental and social criteria (these will be 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 Dublin Transport Authority Act 2008, the NTA is required to make an Integrated Implementation Plan within 9 months of the approval by the Minister for Transport 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 from public transport authorities and operators and reflect the need to ensure the most beneficial, effective and efficient use of financial 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.

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 the road schemes in Table 6.1 as part of a Local Traffic Plan to be prepared following the publication of the NTA Transport Strategy for the GDA.

The Kildare County Development Plan Issues Paper asked the following questions: "Where should ... (...) freight hubs) be located within the county to service both demand to Dublin and demand within the county? How can the movement of goods ..., including heavy goods vehicles within County Kildare be improved in rural and urban areas?". While the Draft Plan contains some policies related to freight (e.g. HGV parking areas – Chapter 6, PK3), it generally does not seem to address the freight questions presented in the Issues Paper, nor does it address wider freight policy issues in the county. For example, there are no objectives or policies in the Draft Plan related to the optimal location of freight intensive activities.

**Recommendation**

As specified above, in relation to the Transport Strategy, the Draft Plan should acknowledge the role of the NTA in the delivery of transport projects in the GDA.

It is recommended that the Draft Plan include an objective, following preparation of the NTA Strategy for the Greater Dublin Area, to support a freight strategy in County Kildare.

**Parking (Chapter 19)**

**Comment**
The control of car parking is a key transport demand management measure which can influence travel behaviour in Kildare. 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 NTA welcomes the use of maximum car parking standards in the Draft Plan and the preparation of car and cycle parking strategies (Objective GT4, Chapter 6, Section 6.5.1), where the Council will seek to provide facilities identified “through the Local Area Plan process or through the planning system”.

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 Draft Plan does not relate maximum permitted parking provision for new developments to public transport accessibility, and proximity to / centrality within urban centres.

The Greater Dublin Area Demand Management Study (GDDMS) recommends that parking provision for new developments should not exceed the maximum standards set out in the following table (Table 6.2²):

<table>
<thead>
<tr>
<th>Activity</th>
<th>Maximum Parking Standard (per gross floor area unless otherwise specified)</th>
<th>Threshold from and above which standard applies (gross floor space)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment, including offices</td>
<td>1 space per 50 m²</td>
<td>1,500 m²</td>
</tr>
<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>Cinema 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</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>

The car parking standards in the Draft Plan exceed these maximum standards.

**Recommendation**

The NTA would recommend that maximum standards be applied with varying degrees of constraint, on the basis of defined location factors such as centrality (for example, town centre locations), public transport accessibility (taking into account proximity and levels of service, interconnectivity between services/networks).

² The GDDMS can be viewed at the following web address: http://www.dfeo.ie/web2006/TDMS.pdf.
In locations where the highest intensity of development occurs (e.g. larger 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.

In addition to approach outlined above, the NTA recommends that the car parking standards in the Draft Development Plan be amended to reflect more appropriate maximum regional parking standards. Related to this, it is recommended that the standards contained in the GDDMS are not exceeded. For example, the Draft Plan specifies a maximum car parking standard for office developments of 1 space per 20/25 sq.m. By contrast, the GDDMS recommends a maximum car parking standard for office developments of 1 space per 50 sq.m.

**Retail (Chapter 9)**

**Comment**

The NTA does not agree with the designation of Collinstown as a Level 2 Major Town Centre in the Draft Plan for the following reasons:

1. The accommodation of further retail growth should, in the first instance, be within existing town centres in the retail hierarchy. The retail hierarchy in the Draft Plan should provide a clear definition of the criteria relating to the function and scaling of retail centres at all levels. This has not been demonstrated in the Draft Plan. In particular, it should provide guidance on the determination of catchment populations, population density and function or type of uses pertaining to retail centres at every level in the hierarchy. This, in turn, should be directly related to the appropriate accessibility criteria across all modes of transport.

2. It is the view of the NTA that the location of a new major town centre for North East Kildare on the periphery of Leixlip is contrary to the national3, regional4 and Draft Plan5 policies relating to the sequential approach for guiding retail development (i.e. the preferred location for new retail development where practicable and viable, is within a town centre). The 2010 Draft Kildare County Retail Strategy demonstrated that there is land available for retail development in Celbridge (Donaghcumper/ town centre backlands), Kilcock (key “Town Centre” zoned sites), Leixlip (limited opportunities at Captains Hill/Mill Lane) and Maynooth (Harbour Area/ Doctor’s Lane backlands). From this the Draft County Retail Strategy has indicated that it would be practical and viable to locate substantial retail

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4 Retail Strategy for the Greater Dublin Area 2008-2016 (DRA/MERA, 2008)
5 Draft Kildare Development Plan - 9.4.2, Ch 9-5
expansion within or adjacent to these four town centres. The scale of retail expansion in these areas, may, at least, reflect local population growth targets. In relation to Leixlip’s retail requirements, whilst it is recognised that the potential for retail expansion in Leixlip town centre is constrained, this would not justify, the scale of development proposed in the Collinstown area.

3. The development of an additional large scale retail centre with a regional and national catchment on a greenfield site and outside the established town centres is not consistent with government retail policy as it “is not regarded as sustainable in relation to transport objectives and consequently, there should be a general presumption against large scale out-of-centre retail development” 6.

4. It is also contrary to NRA policy7 which opposes “large retail centres being located adjacent or close to existing, new or planned national roads/motorways as such centres can lead to an inefficient use of costly infrastructure, may undermine the regional/national transport role of the roads concerned”.

5. There is insufficient justification of the need for this level of net retail comparison floorspace proposed for Collinstown (65,000sqm) within the Draft Plan and it has not been clearly demonstrated that the retail need of existing urban centres would require a town centre of the scale proposed.

6. It is stated in the Draft Plan that the preparation of the Retail chapter has been informed by the 2010 Draft Kildare County Retail Strategy. The 2010 Draft Kildare County Retail Strategy indicates the net comparison floorspace “potential” for Kildare to be 67,489 sqm8. It is not indicated in this Strategy where this potential floorspace will be quantitatively distributed in the county or specifically in North Kildare. Furthermore, it is not clear how the proposed 65,000 sqm of comparison floorspace in Collinstown can be justified given that this total is equivalent to the total comparison floorspace potential for the entire county up to 2022.

7. The Draft Plan does not present the Major Town Centre objectives in the context of its likely impact on the vitality and viability of the existing Level 2/3 centres in County Kildare. Related to this,, its impact on the existing town centre of Leixlip has not been determined.

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6 Retail Planning Guidelines (p26, 70, DOEHLG, 2005)
7 National Roads Authority Policy on Development Control and Access to National Roads
8 This figure is based on RPG population assumptions (low scenario) and the assumption that comparison spending per capita will increase by 38% (it is not clear how this figure was calculated in the Draft Kildare Retail Strategy) between 2008 and 2022. The high population growth scenario, based on the extrapolation of population growth trends up to 2022 would indicate an additional net floorspace potential of 111,366 sqm. The NTA would not consider this to be realistic, given the sharp slowdown in population growth that has occurred due to changed economic circumstances, and the implications this may have for medium term population growth.
It is noted that the Draft Plan states that applications for significant retail development will be assessed against qualitative and quantitative criteria, such as the impact of the development on town centres and the need for sequential development (Chapter 19, 19.10.1). However, the NTA would argue that this should be assessed within the Development Plan process prior to the designation of the retail hierarchy.

Recommendation

Notwithstanding its inclusion in the Retail Planning Strategy for the GDA, the NTA would recommend against the designation of Collinstown as a Level 2 Major Town Centre in the Draft Plan.

Yours Sincerely

[Signature]
Gerry Murphy
Chief Executive Officer