Dear Sir/ Madam,

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

- Core Strategy/ Settlement Strategy
- Movement and Transport
- Development Management Standards (Parking)
- Town Centre Policy and Retail

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

An extract of the recommendations is 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

\(^1\) As amended by section 30(C) of the Public Transport Regulation Act 2009
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 of licensed public bus passenger 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)

Comment
Whatever population and employment growth occurs in the Hinterland, this should be focused on a limited number of large growth towns, thus providing for larger, more localised labour forces as a basis for sustainable development. This should also support the ongoing investment in the strategic transport networks. The NTA, therefore, supports policies in the Draft Plan which seek to:

➢ promote the growth of Naas and assist in fulfilling its role as a growth centre (Ch 2, Section 2.12),
➢ consolidate and avoid sprawl (Ch 2, Section 2.15.1, Policy CS3),
➢ facilitate the development of an attractive and vibrant town centre (Ch 2, Section 2.12) and,
➢ promote a consolidated and compact urban form (Ch 2, Aim).

These policies complement the Development Plan Guidelines for Local Authorities (DoEHLG 2007) which state that “zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference”.

However, it is noted that substantial areas of land at the edge of the town have nonetheless been zoned for development. Furthermore, despite their generally more central location within the town, substantial areas have been denoted as “White Land”. In the North Western Quadrant area, for example, much of the White Land is located within an area identified in both the Draft Plan and Naas IFPLUT for the development of a road (policy RP02) and bus transport corridor, linking the Town Centre with Sallins Station. It is not clear in the Draft Plan why these lands were not zoned in preference to other area, for development within the Plan period.
Recommendation
In relation to the development of zoned lands within the Plan period, it is recommended that a phasing structure be included in the Development Plan which, as far as possible, provides for the sequential expansion of the town on the basis of the approach set out in the DoEHLG Guidelines.

Economic Development (Chapter 3)
One of the aims of the Draft Plan to “reduce the levels of commuting” (Aim, Ch 3) and to “increase the number of people who both live and work in Naas” (Section 3.2.2, Ch 3). Consistent with RPG policy (“... these (large growth towns) will act as important self sustaining regional economic drivers...” Section 4.6, p.73), the linking of employment growth to population growth will be a key factor in achieving this objective and in reducing the level of long distance commuting among the resident workforce in Naas.

The draft Development Plan states that there is a requirement to increase the number of jobs in the County by 49% by 2017 (Table 3.3, Ch 3). According to the CSO, employment in the Mid-East has declined by 1.8% between Q2, 2006 and Q1, 2010 (down 10.2% from peak Q3, 2007), a trend that may also have been reflected in Naas. Based on current ESRI forecasts, employment at a national level may contract further during 2010. Employment would therefore, have to grow at a much faster rate to reach the figure presented in Table 3.3 of the Draft Plan (49% between 2006 & 2016). In light of recent trends, the projections for the Plan period may therefore be unrealistically high. In any case, some explanation in the Plan is merited as to the future basis and nature of employment growth in the town.

If employment does not grow at the rate envisaged in the Draft Plan, but population does, there could be an increase in the jobs ratio within the town, contrary to Development Plan and RPG objectives.

Recommendation
Explain the basis for the employment growth target in the Draft Plan and more generally, the future basis and nature of employment growth in the town.

Movement and Transport (Chapter 7)

Comment
The Draft Plan proposes a number of road and public transport projects for Naas 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:

- 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 of Transport of the NTA Transport Strategy. 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 exchequer resources.

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 the road schemes in Section 7.8.3 as part of a ‘local traffic plan’ to be prepared following the publication of the NTA Transport Strategy for the GDA.

While the Draft Plan contains some policies relating to freight (e.g. management of HGV movement in the town –GO6), it generally does not address wider freight policy issues in the Naas area. For example, there are no objectives or policies in the Draft Plan related to the optimal location of freight intensive activities in Naas.

The Draft Plan contains two objectives (GO4, STOS) to examine, in conjunction with the NTA, the provision of a Park and Ride site in the Naas area to serve both “commuters to Dublin and local trip makers”. These objectives should be further elaborated upon and linked to related policies in the Draft Plan, addressing, for example, the reallocation of road space in Naas, bus priority in the vicinity of the park and ride site and consistency with other land use and transport objectives.

Recommendation
The Draft Plan should acknowledge the role of the NTA in the delivery of transport projects in the GDA (specified above).

The Development Plan should include the following objectives:
Review, and set out an implementation plan, for the road schemes in Section 7.8.3 as part of a ‘local traffic plan’ to be prepared following the publication of the NTA Transport Strategy for the GDA.

The Draft Plan should contain an objective to develop a freight policy for Naas, as part of an overall freight policy for County Kildare.
The Park and Ride objectives should be further elaborated upon and linked to related policies in the Draft Plan.

**Parking (Chapter 13)**

*Comment*

The control of car parking is a key transport demand management measure which can influence travel behaviour in Naas 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 NTA welcomes the inclusion of maximum car parking standards in the Draft Plan (Cht 13, Table 13.8). However, 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 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 Naas town centre.

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 would recommend 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, proposed in the GDDMS. For example, the Draft Plan specifies a

---

1 The GDDMS can be viewed at the following web address: [http://www.dto.ie/web2006/TGMS.pdf](http://www.dto.ie/web2006/TGMS.pdf)
maximum car parking standard for office developments of 1 space per 20/25 gsqm 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.

**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                               |
| **Food retail**                                 | 1 space per 14 m²                               |
| **Non food retail**                             | 1 space per 20 m²                               |
| **Cinemas and conference facilities**           | 1 space per 5 seats                             |
| **Higher and further education**                | 1 space per 2 staff + 1 space per 15 students   |
| **Threshold from and above which standard applies (gross floor space)** | 1.500 m²                                        |
|                                                 | 1.000 m²                                        |
|                                                 | 1.000 m²                                        |
|                                                 | 1.000 m²                                        |
|                                                 | 2500 m²                                         |

**Town Centre Policy and Retail (Chapter 5 & 6)**

*Comment*

The NTA supports the aim within the Draft Plan to “support, protect and reinforce the role of Naas Town Centre as the primary retailing and service area of Naas” (Ch 5, Aim).

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 sqm (based on RPG population assumptions and the assumption that comparison spending per capita will increase by 38% between 2008 and 2022. It is not indicated in the Retail Strategy where this potential floorspace will be quantitatively distributed in the County or more specifically, in Naas.

*Recommendation*

It is recommended that the amount of projected retail growth for the Draft Plan period be stated in the Draft Plan. The transport policies and objectives in the Plan should also reflect the need maintain and improve accessibility to the town centre, both from within the town and from within its wider catchment, by a range of transport options, including walking, cycling bus/rail and car. Complementary to this, there should be a strong presumption in favour of accommodating the town’s future retail requirements within the Town Centre (A, A2) zoned lands and equally, a presumption against further substantial edge of town retail development, which could undermine economic viability and vitality of the town centre.
Conclusion

The NTA would consider that if the above recommendations are reflected in the Development Plan, it would enable greater consistency with the RPG, Government policy and the general objectives of the NTA, as presented.

Yours Sincerely

Gerry Murphy
Chief Executive Officer