

The Senior Planner,
Forward Planning Department,
Town Hall,
Dundalk

17th December 2014

Re: Draft Louth County Development Plan 2015-21

Dear Sir/Madam,

The National Transport Authority (the Authority) welcomes the opportunity to comment on the Louth County Development Plan (Draft Plan). Reviewing the draft Plan, the Authority has focused on a number of policy areas which are considered to be critical to achieving:

- Greater consolidation of future population and employment location; and
- Integrated Land Use and Transport Planning, as manifested by:
 - the optimisation of investment by the Council, NTA and other agencies in transport infrastructure;
 - improved and more effective public transport services;
 - improved accessibility to jobs and services; and,
 - reduction in car dependency.

The following comments are broken down by chapter for ease of reference.

Chapter 2 Core Strategy and Settlement Strategy

The Authority would stress the need to focus future population and employment growth within key settlement centres of the county, namely Dundalk and Drogheda. As such the Authority welcomes the

Development Plan proposals to allocate circa 80% of future population growth into these towns as outlined in Tables 2.4 & 2.6 and Policy CS1¹.

While the prescriptive approach to the distribution of future population growth outlined in tables 2.4 & 2.5 is welcomed, the Authority would query the allocation into 'Tier 4' villages. The proposed growth of 30 people or 11 housing units across 20 rural village settlements (with multi-unit developments of up to 6 units permitted – Policy SS12) will be difficult to control. While the Authority does not support dispersed residential development in areas which may generate long distance urban commuting, it is acknowledged that there is a requirement for some new residential development in rural areas to facilitate and maintain local communities. The Authority recommends that the County Council reviews the allocation for 'Tier 4' and suggests that it may be more appropriate to amalgamate the category with 'Rural Areas' with an expanded assessment criteria in line with the rural local needs qualifications outlined in Chapter 2.

The Authority supports the Draft Plan's policies on rural housing which seeks to restrict the development of rural housing based on clearly defined eligibility criteria. This will facilitate the requirements of the local rural communities, whilst also controlling the pressures for urban influenced housing demand. Outside locally focused Rural Transport Services, it is impossible to adequately supply Public Transport to dispersed rural communities, it is therefore essential that this policy is strongly applied to ensure that Louth can move towards a less car dependent, and more public transport focused pattern of development.

The Authority supports the prioritisation of development into towns and locations which facilitate the consolidation of land uses, and supports the potential for trips to be made by walking, cycling or Public Transport. In this regard, the Authority recommends that Local Area Plans should be prepared for such locations to ensure that development occurs in a coordinated and sustainable manner. The Authority acknowledges and welcomes the commitment in the Development Plan to update / replace the following outdated plans:

- Dundalk and Environs Development Plan 2009-2015
- Drogheda and Northern Environs 2011 - 2017
- Ardee Local Area Plan 2009- 2016
- Dunleer Local Area Plan 2009-2016

Chapter 4 Recreational and Community

In relation to development of social infrastructure, the Authority recommends that increased emphasis is placed on the integration of land use and transport, particularly in relation to the design of residential layouts and in terms of the location of future school locations. In this regard, the Authority would recommend that the follow points are taken into account, particularly in relation to Section 4.6 Pedestrian and Cycle Infrastructure, and 4.18 Community Facilities.

¹ The NTA note a number of discrepancies between the text in the report and the tables – the figure of circa. 80% was taken from Table 2.4 & 2.5, however the text in Section 2.9 refers to 60% of the growth allocation going to Tier 1 centres.

- Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools;
- New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes;
- The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;
- Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips.

To add greater clarity to the policy position of the Development Plan, the Authority suggests that these points are also cross referenced in other relevant chapters of the draft plan.

Chapter 6 Economic Development, Tourism and Retail

The Authority supports the development of trip destinations (employment, retail etc.) at locations which can optimise the integration of land use and transport provision, particularly in terms of maximising the potential to access such developments by walking, cycling or on Public Transport. In this regard, the Authority welcomes the Development Plan linking economic growth patterns to the Settlement Hierarchy.

The Authority supports the DOECLG/NRA policy in relation to the location of development on or adjacent to the strategic road network. It is imperative that the strategic transport function of the national roads, including motorways, are maintained by limiting the extent of development that would give rise to the generation of local car-based traffic on the national road network.

In this regard, the Authority has concerns over policy EDE 12 which states:

“To promote and facilitate development at urban-related interchanges in accordance with the zoning provisions of the Dundalk and Environs Development Plan 2009-2015 and the North Drogheda Environs Local Area Plan 2004 and any subsequent Local Area Plans adopted.”

The aforementioned policy documents are outdated, and at this point in time should not be referred to in the Development Plan as a source of policy guidance for new development. The Authority recommends that reference to the Dundalk and Environs Development Plan 2009-2015 and the North Drogheda Environs Local Area Plan 2004 be removed from this policy statement. If such development is to occur it should be clearly supported within the new Local Area Plans proposed for these areas, which will fully reflect the policies of the new Development Plan.

Also, in relation to the potential for future development in the vicinity of interchanges, the Authority recommends that any development should be in accordance with the principles set out in the DOECLG Spatial Planning and National Roads Guidelines (2012), and that this should be stated as part of any Development Plan policy.

Chapter 7 Transport

The Authority acknowledges the importance of the Council's role in providing an operating environment in which bus services can operate on an efficient and reliable basis and provide a more competitive alternative to the car and contribute to achieving Draft Plan's sustainable transport objectives, particularly in the urban centres of Dundalk and Drogheda. The Authority can liaise with the Council as requested on the achievement of these objectives.

In relation to cycling infrastructure, the Authority believes that the policies set out in the Development Plan could be strengthened. In relation to Cycle Parking and Facilities, the Authority suggests that section 7.3.9.3 is broadened to better reflect the quality of facilities required to make cycling an attractive travel option. By way of example, the Authority recommends that the County Council review the corresponding section from the Dublin City Development Plan (section 17.41) with a view to reproducing something similar in the Development Plan. Section 17.41 of the Dublin City Development Plan has been included in Appendix 1 for reference.

The Authority also recommend that a policy is included in the Development Plan which states that new / retrofitted cycle infrastructure within the county will be designed in line with the recommended approach outlined in the NTA's National Cycle Manual.

Conclusion

The Authority wishes to acknowledge the work of Louth County Council in preparing the draft plan, which is generally consistent with the policy position of the NTA. In conclusion, the Authority would request that the following issues are taken into account when finalising the Development Plan:

- Review of Tier 4 Settlements, with reference to the potential to amalgamate the category with 'Rural Areas';
- Increased emphasis on the integration of land use and transport, consolidation of development, and complementarity of land uses, and where possible cross reference of these points throughout the plan;
- Revision of Policy EDE12, with reference to DOECLG policy guidance;
- Strengthen the policies in relation to cycling infrastructure, with reference to NTA policy guidance.

We trust that the views of the Authority be taken into consideration in the review of the development plan, and would be available to discuss issues arising from the comments made.

Yours sincerely,



Hugh Creegan

Director of Transport Investment and Taxi Regulation

17.41 CYCLE PARKING

(see section 5.1.4.4)

Secure cycle parking facilities shall be provided in new Public Transport Interchanges, office blocks, apartment blocks, shopping centres, hospitals, etc., in accordance with the standards set out in Table 17.2. Bicycle Parking Stations should be provided in strategic new Public Transport Interchanges. Secure bicycle racks shall be provided in all cases where bicycle parking is deemed to be necessary by the planning authority. Such racks should be within 25m of a destination for short-term parking (shops) and within 50m for long-term parking (school, college, office). All long-term (more than three hours) cycle racks shall be protected from the weather.

All on-street stands or racks should be capable of performing the basic functions of supporting the bicycle and protecting it against theft or vandalism. Off-street storage/parking facilities should provide adequate shelter, lighting, safety and security, ease of access and egress, and an appropriate level of supervision.

Guidance for selecting the most appropriate type of bicycle parking facility depending on location and user needs is outlined in the National Cycle Manual. 'Bicycle Parking Facilities' Dublin City Council will have regard to this document when considering applications where bicycle parking is a requirement.

17.41.1 Multi-Storey Car Parks and Cycle Facilities

All cycle facilities in multi-storey car parks will be at ground floor level and completely segregated from vehicular traffic. Cyclists should also have designated entry and exit routes at the car park.

17.41.2 Location of Cycle Stands

Cycle parking facilities will be conveniently located, secure, easy to use, adequately lit and well signposted. Weather protected facilities should be considered where appropriate. In addition, parking should be placed within a populated, well supervised area, and monitored by CCTV where possible.

17.41.3 Security

Cyclists should be able to secure both frame and wheels to the cycle parking stand. Secure cycle compounds should be provided where feasible and in particular in large office developments, multi-storey car parks and railway stations.

17.41.4 Shower and Changing Facilities

Suitable shower and changing facilities will be made available in large-scale developments incorporating high amounts of cycle parking. Facilities should be secure, lockable and located in well-lit locations. The following standards shall be adhered to:

- 1 shower per office development over 100sq.m (approximately 5 employees)
- A minimum of 2 showers for office developments over 500sq.m (approximately 25 employees).
- 1 shower per 1000sq.m thereafter
- Changing/drying areas, toilets and lockers should be provided in association with shower facilities.

17.41.5 Lockers

The number of lockers provided should relate to the number of cycle parking spaces. Lockers should be well-ventilated, secure and lockable. Lockers that facilitate multiple short-term users are recommended.

17.41.6 Financial Contributions

In exceptional circumstances, where cycle parking cannot be incorporated into the development, the developer will be required to pay a financial contribution in lieu of providing the cycle parking. Where a developer is unable or does not wish to provide the specified number of cycle parking spaces on site, a financial contribution in lieu will be required towards the cost of providing such spaces off the site, where such a relaxation is deemed appropriate by the planning authority. Such a contribution will be set at €400 for each cycle parking space, or as amended by the Dublin City Council Cycling Strategy.