

Catriona Barrett,
Planning System and Spatial Policy,
Department of the Environment, Heritage and Local Government,
Custom House,
Dublin 1.

10th September 2010

Re: Spatial Planning and National Roads – Consultation Draft: Guidelines for Planning Authorities (June 2010)

Dear Catriona,

The National Transport Authority (NTA) welcomes the publication of the Spatial Planning and National Roads – Consultation Draft: Guidelines for Planning Authorities and submits the following observations, presented in the following order:

- Comments
- Recommendations

Role of the NTA

Comment

Within the Greater Dublin Area (GDA), the National Transport Authority has a significant role in the planning, delivery and management of existing and new road infrastructure, through, inter alia, the preparation of:

- a strategic transport plan¹ which provides a long-term strategic planning framework for the integrated development of transport infrastructure and services in the GDA,
- an integrated implementation plan,²
- a strategic transport traffic management plan³ and
- traffic management guidelines⁴.

¹ Section 12 of the Dublin Transport Authority Act 2008

² Section 13 of the Dublin Transport Authority Act 2008

³ Section 64 of the Dublin Transport Authority Act 2008

⁴ Section 66 of the Dublin Transport Authority Act 2008

The statutory role of the NTA is not fully integrated into the Guidelines and there is a need to incorporate the statutory role of the NTA strategy, implementation plan and strategic traffic management plan in the GDA. The Guidelines should, therefore, reflect the significant role of the NTA in:

- determining the provision of road infrastructure (including access to the national road network and junction management controls),
- land use and transport planning in the GDA, and
- in securing priority for public transportation national roads in the GDA.

Furthermore, all development proposals affecting the national road network in the GDA should be consistent with the NTA Strategy.

This is supported by Section 74 of the Dublin Transport Authority Act 2008, allowing the NTA to give direction to the NRA. Furthermore under Section 75 of the Act it is stated that *“the NRA, with regard to its activities within the GDA, and the road authorities shall ensure that they exercise their functions in a manner consistent with the transport strategy of the Authority”*.

Role of the regional authorities

Comment

Under Section 12 of the Planning and Development (Amendment) Act 2010 Section 23 of the Planning and Development Act 2000 is amended as follows *“The Guidelines shall address....the promotion of sustainable settlement and transportation strategies in urban and rural areas”*. Related to this, regional authorities, such as the Midland Regional Authority, have included in their Regional Planning Guidelines, a *sustainable transport hierarchy* for their region including a commitment to prepare a *coordinated sustainable transport plan* at regional level. The planning of national roads generally and the consideration of development related to national roads should be determined on the basis of such transport strategies at the regional level and any related transport plans at county (local transport plans) and at the local level.

Recommendations

The Guidelines should reflect the significant role of the NTA in:

- determining the provision of road infrastructure (including access to the national road network and junction management),
- land use and transport planning in the GDA, and
- securing priority for public transportation national roads in the GDA.

Furthermore, all development proposals affecting the national road network in the GDA should be consistent with the NTA Strategy.

The planning of national roads generally and the consideration of development related to national roads should be determined on the basis of transport strategies

at the regional level and any related transport plans at county (local transport plans) and at the local level (see above).

Chapter 1- Introduction

Comments

The NTA welcomes the publication of this consultation draft relating to development affecting national roads outside the 50 kph speed limit zones for cities, towns and villages. However, on the basis of actual speed limits applied there are many areas located alongside national roads within larger urban areas which these policy guidelines could also apply to. It is therefore recommended that the scope of these Guidelines be broadened to reflect this.

In general, the NTA supports the key principles in the Guidelines, particularly in relation to the integration of land use and transport planning and that *“future development is guided to suitable locations”*. The NTA also welcomes the inclusion of the principal that development should be plan led and *“that future development should be guided into [town and city centres]”* It is mentioned in the Guidelines that future development should also be guided into *“strategic employment sites”*(p10). This type of site needs to be defined in the Guidelines.

NTA Recommendations

On the basis of actual speed limits applied there are many areas located alongside national roads within larger urban areas which these policy guidelines could also apply to. It is therefore recommended that the scope of these Guidelines be broadened to reflect this.

It is mentioned in the Guidelines that future development should also be guided into *“strategic employment sites”*. This type of site needs to be defined in the Guidelines.

Chapter 2 – Development Planning and Roads

Comments

Development around national roads

It is stated in the Guidelines that *“where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, development plans should ensure that the capacity on national roads is utilised appropriately”* (p20). The Guidelines should be more specific about developments adjacent to national road interchanges and developments requiring direct access to the national road network. There are many examples throughout the country of the rezoning and development of land outside of cities and towns and which are also adjacent to national road interchanges, which are contributing or have the potential to contribute to the early obsolescence of the interchange and to development sprawl outside of these centres.

The Guidelines should therefore state that development proximate to strategic road interchanges should be strictly controlled and recommend that development be focussed on more appropriate locations. For example, the Guidelines should state explicitly that employment intensive development on lands adjacent to strategic road interchanges should be prohibited. The prioritisation of development (in particular destinations which attract a large number of trips) into higher order urban centres and/or existing or proposed high capacity public transport nodes, with development scale related to public transport accessibility is critical to support sustainable travel choices and public transport investment.

Lower employment-intensive/goods-based uses with associated freight transport operational requirements (for example, warehousing/distribution) have different accessibility requirements to, for example, office-based employment where access to the national road network is often an important consideration in determining their optimal location. There should be a presumption that such activities are proximate to or within urban centres.

It is stated in Section 2.5 of the draft Guidelines that *“within the early stages of drafting city and county development plans ...planning authorities may identify limited development areas where the requirements in relation to access to national roads in more rural areas might be more flexibly applied. Exceptional circumstances potentially involve developments of national and regional strategic importance provided for in local authority development plans and which by their nature are most appropriately located outside urban areas, where the locations concerned have specific characteristics that make them particularly suitable for the developments proposed”*. The NTA would recommend that this section be omitted as it appears to be open to considerable interpretation and has the potential to undermine the key objectives of the Guidelines.

Retail Developments

In the current Retail Planning Guidelines, there is a strong presumption against, *“large retail centres located adjacent or close to existing, new or planned national roads/motorways. Such centres can lead to an inefficient use of costly and valuable infrastructure and may have the potential to undermine the regional/national transport role of the roads concerned”*. This is consistent with current NRA policy⁵ 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”*.

Notwithstanding the above policy, since the Retail Planning Guidelines were produced in 2001, there have been numerous examples of the zoning and/or the development of lands adjacent to national road interchanges for large scale retail

⁵ National Roads Authority Policy on Development Control and Access to National Roads

developments which are contributing to, or have the potential to contribute to the early obsolescence of their related national road interchanges and to the undermining of established town or city centres. The basis for current retail planning policy needs to be reinforced in the Guidelines for Spatial Planning and National Roads and the new Retail Planning Guidelines⁶ to ensure that greater restrictions are placed on such developments in the future. Such restrictions should not be limited to large scale retailing.

It is recommended that the Guidelines for Spatial Planning and National Roads strongly recommend against any further development of car-based self-contained shopping centres or other forms of retail development such as retail warehousing on national roads, in favour of mixed use developments, which support the role of existing town centres (this needs to be co-ordinated with the new Retail Planning Guidelines).

Reallocation of Road Space

It is stated in the key messages that *"development plans must include clear policies and objectives with regard to planning and reservation of new routes and/or upgrades"*.

The Guidelines should include further guidance on planning policy on the construction of new and improved national roads, including bypasses. The construction of these roads should be accompanied by a re-examination of the function, shape and use⁷ of the existing road network and the reallocation of road space as appropriate on the existing road network, to pedestrians, cyclists and public transport in order to secure the local environmental benefits that such road improvements can provide. Failure to do so could result in a return to pre-bypass conditions in a town or village as unconstrained vehicular provision may fill available capacity over time. This is of particular reference in the case of offline national route upgrades including town bypasses.

Appraisal of new road projects against national policy and GDA Transport Strategy policy

It is stated in the Draft Guidelines that *"development plans must include clear policies and objectives with regard to planning and reservation of new routes and/or upgrades"*. However, there is no guidance within the draft Guidelines on how new road projects should be appraised against national policy and how such guidelines should be incorporated into development plans.

Many new roads or road upgrades can provide economic benefits by reducing journey times, for a range of trip purposes and modes, including the movement of goods. However any proposal to provide new or upgraded road infrastructure should

⁶ These guidelines are currently being reviewed by the Department of Environment, Heritage and Local Government.

⁷ See Traffic Management Guidelines (p15)

be clearly objective led. Critically, the provision of new roads should not undermine public transport investment.

To ensure that new road proposals meet national policy and GDA Transport Strategy Policy, the NTA recommends that the Guidelines should specify that each new or upgraded element of national road infrastructure should be judged against a range of economic, environmental and social policy criteria.

Consultation with the NTA

It is stated in the key messages in Chapter 2 that *“planning authorities should consult at a very early stage with transport infrastructure providers”*. This should be amended to *“planning authorities should consult at a very early stage with transport infrastructure providers and with the NTA in the Greater Dublin Area”*. This change should be reflected within Chapter 2.

Recommendations (Chapters 2)

The following elements should be included in the Guidelines:

- The Guidelines should therefore state that development proximate to strategic road interchanges should be strictly controlled and recommend that development be focussed on more appropriate locations. For example, the Guidelines should state explicitly that employment intensive development on lands adjacent to strategic road interchanges should be prohibited.
- Lower employment-intensive/goods-based uses with associated freight transport operational requirements (for example, warehousing/distribution) have different accessibility requirements to, for example, office-based employment where access to the national road network is often an important consideration in determining their optimal location. There should be a presumption that such activities are proximate to or within urban centres.
- The NTA recommends that Section 2.5 of the Draft Guidelines be omitted as it appears to be open to considerable interpretation and has the potential to undermine the key objectives of the Guidelines.
- The Guidelines should include further guidance on planning policy on the construction of new and improved national roads, including bypasses. The construction of these roads should be accompanied by a re-examination of the function, shape and use⁸ of the existing road network and the reallocation of road space as appropriate on the existing road network, to pedestrians, cyclists and public transport in order to secure the local environmental benefits that such road improvements can provide.
- Any proposal to provide new or upgraded road infrastructure should be clearly objective led. Critically, the provision of new roads should not undermine public transport investment.
- To ensure that new road proposals meet national policy and GDA transport strategy, the NTA recommends that the Guidelines should specify that each new

⁸ See Traffic Management Guidelines (p15)

or upgraded element of national road infrastructure should be judged against a range of economic, environmental and social policy criteria.

- It is stated in the key messages in Chapter 2 that *“planning authorities should consult at a very early stage with transport infrastructure providers”*. This should be amended to *“planning authorities should consult at a very early stage with transport infrastructure providers and with the NTA in the GDA”*. This should be reflected within Chapter 2.

Comments on Cht 3 (incorporating comments on Cht 2)

NTA Role

It is stated in the Key Messages in Chapter 3 that *“Planning Authorities should put in place effective mechanisms to refer all planning applications on, or with the capacity to affect, national roads to the NRA”*. This should be amended to *“Planning Authorities should put in place effective mechanisms to refer all planning applications on, or with the capacity to affect, national roads, to the NRA and the NTA in the GDA”*. This change should be reflected within Chapter 3.

Demand Management

Section 3.4 of the draft Guidelines mentions that *“applicants should prepare and submit proposals that will minimise the traffic generated by their development”*(p33). The NTA welcomes the reference to travel demand management as it this complements the aims of Smarter Travel, A Sustainable Transport future (Department of Transport) which states *“to reduce distance travelled by private car and encourage smarter travel, including focusing population growth in areas of employment and to encourage people to live in close proximity to places of employment and the use of pricing mechanisms or fiscal measures to encourage behavioural change”*.

However, the scope of the travel demand management measures are limited within the draft Guidelines to applicants *“who should prepare and submit proposals that will minimise the traffic generated by their development”* (p33). The Guidelines should examine the wider role of travel demand management which could complement land use policies on the appropriate location of development.

For example, according to the Greater Dublin Travel Demand Management Study⁹ (p3), a wide variety of techniques are available to assist managing the demand for travel, including planning policy and practice, fiscal measures, traffic and parking management measures, technology and mobility management plans.

Recommendations

It is stated in the Key Messages in Chapter 3 that *“Planning Authorities should put in place effective mechanisms to refer all planning applications on, or with the capacity*

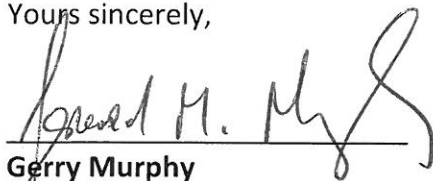
⁹ While this is GDA specific study, its principles can be applied to a national context.

to affect, national roads to the NRA". This should be amended to "Planning Authorities should put in place effective mechanisms to refer all planning applications on, or with the capacity to affect, national roads, to the NRA and the NTA in the GDA". This change should be reflected within Chapter 3

The Guidelines should examine the wider role of travel demand management which could complement land use policies on the appropriate location of development (see above).

I trust the views of the NTA will be taken into consideration in the completion of the new guidelines. If there are any questions arising in relation to the above recommendations, I would welcome the opportunity to discuss these with you.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Gerry M. Murphy', written over a horizontal line.

Gerry Murphy
Chief Executive Officer