

Ms. Finola McDonald
Planning System and Spatial Policy
Dept of the Environment, Heritage and Local Government
Custom House
Dublin 1

30th July 2010

Dear Madam,

Re. Review of the Retail Planning Guidelines (2005) – Issues Paper

The National Transport Authority (NTA) submits the following comments on the Review of the Retail Planning Guidelines (2005) – Issues Paper. These focus on the following categories referred to in the Issues Paper:

- Sustainable land use planning issues
- Travel and parking policy issues
- Issues related to how the Guidelines have been implemented

Introduction - context for retail planning guidelines

Retailing performs a critical function in enabling the development and perpetuation of urban centres at all levels, where such centres provide a range of services, of both a commercial and non-commercial nature, to meet the needs of society. The provision of these services is intended to meet agreed social, economic and increasingly, environmental objectives and can be most effectively achieved on the basis of a clearly defined hierarchy of centres with associated scales, functions and catchments attributed to centres at each level in the hierarchy. Implicit in this structure is the ability to provide for:

- a range of commercial and non-commercial services at the appropriate level of locality,
- the facility to link trips of different purposes,
- the facility to reduce the need to travel, and
- the ability to develop, improve and manage transport networks in a manner which provides a range of transport options and the greatest potential for the use of public transport, walking and cycling.

The social, economic and environmental objectives relating to the provision of retail services at different levels need to be reflected within the new Guidelines. Also, the appropriate location for these centres, at each level in the hierarchy, should be

evaluated against these objectives. In this context, accessibility for all within defined catchments, should be a key objective in providing retail and other services in urban centres at all levels.

In recent decades, retailing has been planned on the presumption of car-based accessibility. However, recent policy changes from national down to local level are seeking to redress the problems arising from this pattern of development in favour of more sustainable development, based on integrated transport solutions. This policy shift needs to be fully reflected in the new Guidelines.

Sustainable land use planning issues

Promote the location and retention of retail development in established of planned urban centres.

The Issues Paper states that *“changed economic circumstances and trends in retail formats encourage developers to seek more cost efficient edge-of-town or out-of – town locations”* resulting in *“greater town centre vacancy undermining the vitality and vibrancy of town centres and sustainable land use planning objectives”*.

In the decade since the existing Guidelines were published, there have been numerous examples of retail developments, which have been proposed, developed or expanded on the basis of the car-based, self-contained shopping centre model, with a limited mix of commercial land uses, with little interaction/connectivity with the surrounding local area and whose primary locational determinants have been based on access to the national road network. In addition, this type of retail development has often resulted in designs/layouts that reduce accessibility potential by non-car modes, and that reduce walking/cycling accessibility from within local catchment areas. Their scale and location can also serve to undermine existing town centres or provide a weak basis for their development over time as focal points for new urban centres. The new Guidelines should place a strong emphasis against further developments of this type in favour of a mixed use developments, which focus on the consolidation of existing town centres.

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 policy¹ 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”*.

¹ National Roads Authority Policy on Development Control and Access to National Roads

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 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 policy needs to be strengthened to ensure that greater restrictions are placed on such developments in the future.

Public Transport & Catchment Definition

There is a reference within the current Retail Planning Guidelines, to district centres *“performing an important function for the local community living 15-20 minute drive time of the site (p26)”*. Retail catchment areas continue by and large, to be loosely defined, based on the flexibility afforded by the presumption of car-based accessibility (drive-time catchments). Access by public transport, walking and cycling must be a priority in retail policy and as such, the prioritisation of accessibility by public transport, walking and cycling for retail development at all levels will necessitate new approaches to catchment definition. In larger urban centres, the promotion of public transport accessibility should be a key consideration in the location and scale of retail development, the definition of retail catchments and the manner in which they relate to the hierarchy of centres.

Travel and parking policy issues

The new Guidelines need to provide guidance on the appropriate form of access to retail facilities at different levels in the hierarchy and on reducing reliance on the private car. The level of parking provision and the management of parking (including charging) is crucial in this context and should be addressed in the new Guidelines by way of guidance on how parking provision should be determined and how parking should be managed for a range of retail uses and non-retail uses and at different levels in the retail hierarchy. For example, parking provision related to convenience and comparison-shopping at different levels in the retail hierarchy should be informed by clearly defined catchment populations and accessibility objectives relating to all modes.

The Issues Paper asks the question *“should edge of centre and out of town retail outlets be required to charge for on-site parking”*. Edge of centre and out of town retail outlets have a competitive advantage over town centres as they can provide large volumes of free car parking, resulting in the undermining of town centre locations where parking is restricted and/or charged for. The new guidelines should specify the need for parking management plans to be prepared by local authorities for all designated higher order retail centres, against which the parking requirements of individual retail developments can be assessed. These would ideally be prepared and reviewed as necessary in the context of a package of transport demand management measures, inclusive of:

- charging regimes for parking (parking charges should be applied, particularly in higher order centres),
- parking supply,
- parking control measures/enforcement
- parking locational criteria, and
- mode split targets.

These would need to be established in the context of a consistent approach being applied across local authority areas and in the context of a clearly defined hierarchy of retail centres at regional level.

Issues related to how the Guidelines have been implemented

Expenditure Leakage

The new Guidelines should address the policy by some local authorities to maximise the retention of retail expenditure within each of their respective administrative areas, irrespective of the spatial distribution of population and urban centres, as evidenced in the Retail Planning Strategy for the Greater Dublin Area.

Retail developments and the distribution and type of retail floorspace should be planned for on the basis of a clearly defined hierarchy of centres at regional level, rather than necessarily on the basis of the retention of retail expenditure within areas defined by local authority administrative boundaries.

Summary of Recommendations

The provision of services is intended to meet agreed social, economic and environmental objectives and can be most effectively achieved on the basis of a clearly defined hierarchy of centres with associated scales, functions and catchments attributed to centres at each level in the hierarchy.

The new Guidelines should place a strong emphasis against any further development of car-based self-contained shopping centres on strategic roads, in favour of a mixed use developments, which focus on the consolidation of existing town centres.

Access by public transport, walking and cycling must be a priority in retail policy and as such, the prioritisation of accessibility by public transport, walking and cycling for retail development at all levels will necessitate new approaches to catchment definition.

The new Guidelines need to provide guidance on the appropriate form of access to retail facilities at different levels in the hierarchy and on reducing reliance on the private car.

The new guidelines should specify the need for parking management plans to be prepared by local authorities for all designated higher order retail centres, against

which the parking requirements of individual retail developments can be assessed. These would ideally be prepared and reviewed as necessary in the context of a package of transport demand management measures, in which parking charges should be included.

Retail developments and the distribution and type of retail floorspace should be planned for on the basis of a clearly defined hierarchy of centres at regional level, rather than necessarily on the basis of the retention of retail expenditure within areas defined by local authority administrative boundaries.

I trust the views of the NTA will be taken into consideration in the preparation 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,



Gerry Murphy
Chief Executive Officer