Planning Department
Meath County Council,
Abbey Mall,
Abbey Road,
Navan,
County Meath.

11th March 2013

Re: Draft Kells Development Plan

Dear Madam/Sir,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Draft Kells Development Plan.

The Dublin Transport Authority Act 2008 provides that each planning authority within the GDA shall ensure that its local area plans are consistent with the Greater Dublin Area Transport Strategy for the period 2011-2030. The Authority has published a draft Transport Strategy and the final document has been submitted to the Minister for Transport, Tourism and Sport for approval. While the Transport Strategy is a draft document, the Authority bases its observations on the policies, objectives and measures contained within the draft Transport Strategy.

During the preparation of the Development Plan, the Authority has worked with Meath County Council to identify transport investment priorities and to ensure the effective integration of transport and land use planning. The Authority welcomes the approach taken to local transport planning and the adoption of a sequential approach to the development of residential zoned land whereby, inter alia, residential zoned lands closest to the town centre/public transport is prioritised for development. In particular, the Authority welcomes the objective to implement a heavy goods vehicle ban in Kells and the identification of a range of walking and cycling measures in the Local Transport Plan for the purposes of increasing the mode share for shorter trips. While the Authority
broadly supports the Draft Plan, the Authority has identified the following comments and recommendations for consideration by Meath County Council.

Traffic Management Measures

Comment
The Kells Local Transport Plan states that a new traffic management scheme will be implemented. The Authority recommends that the primary objective of any new traffic management scheme should be to significantly improve the environment for pedestrians and cyclists and prioritise public transport movements in Kells.

Recommendation
The Authority recommends the Tran Obj 3 ("To implement the specific Traffic Management measures for the town centre as outlined in the Kells Local Transport Plan") be expanded to include reference to the objective to significantly improve the environment for pedestrians and cyclists and prioritise public transport movements. This should also reference the need to consult with the NTA on the introduction of revised traffic management measures.

Car Parking Standards

Comments
The supply and management of parking at a destination is central to the management of transport demand. There is no reference to car parking standards in the Draft Plan.

Recommendation
In relation to car parking in Kells, the Authority recommends that all non-residential development proposals in the GDA should be subject to maximum parking standards (see Table 8.1 of the Draft Transport Strategy, which shows a number of these land uses and sets out regional maximum standards which should apply to them).

Consistency with core strategy

Comments
The Authority notes that the proposed residential densities in the Draft Plan deviates from the Meath County Development Plan core strategy, as is "considered befitting to the Heritage Town status of Kells". The Authority considers that there is insufficient justification provided in the Draft Plan for deviating from the Meath core strategy. In addition, there is no evidence presented that higher residential densities are inconsistent with Heritage Town status.
Recommendation
The Authority recommends that, in the absence of sufficient justification for lower densities in Kells, the Draft Plan should be amended to be consistent the Meath County Development Plan core strategy.

The Authority requests your consideration of the above comments.

Yours sincerely,

Hugh Creegan
Director of Transport Investment and Taxi Regulation