

Ms. Deirdre Scully
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1st Floor Mainscourt,
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25th March 2010

Re. Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022

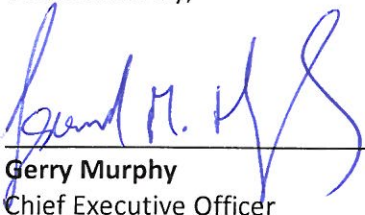
Dear Ms Scully,

The National Transport Authority (NTA) wish to submit the following attached submission on the Draft Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs). The submission has been split into three sections as follows.

1. Introduction
2. Detailed Comments and Recommendations
3. Appendices

The NTA would like to formally acknowledge the close working relationship it (and previously the DTO) has had with RPGs Office during the preparation of the draft RPGs, and looks forward to continuing this liaison. If you have any queries, or would like to discuss this submission further, please do not hesitate to contact me.

Yours sincerely,


Gerry Murphy
Chief Executive Officer

1. Introduction and Summary of Key Points

Introduction

Part 5 of the Public Transport Regulation Act 2009 and the related amendments to the Planning and Development Act 2000 assign a statutory role to the NTA in the preparation of regional planning guidelines to be produced by all regional authorities in the State. In relation to the Greater Dublin Area (GDA), there is a further statutory requirement, under Section 95 of the Dublin Transport Authority Act (2008) for the Dublin and Mid-East Regional Authorities to ensure, when making regional planning guidelines, that they have consulted with the NTA during the preparation of the guidelines, and that they are consistent with the NTA's transport strategy.

As the NTA is still in the process of completing the transport strategy, and because of the fact that the Regional Planning Guidelines for the GDA are at draft stage, it will not be possible to formally initiate this process.

In light of this, the intention of this submission is to set out a number of observations on the Draft RPG, that are based on stated Government objectives of reversing current unsustainable travel trends and behaviour, and of delivering transport in the most effective manner from a social, environmental and economic perspective. In this regard, the NTA places a strong emphasis on the need to improve the alignment of spatial and transport planning, and on the critical role of proper planning and sustainable development in supporting a switch to more sustainable modes of travel – i.e. walking, cycling and public transport - for all trip purposes. As such, it is imperative that the RPGs for the Greater Dublin Area (GDA) and across the State support the targets, policies and objectives of the *National Spatial Strategy, Smarter Travel (A Sustainable Transport Future)* and support the capital investment programme set out in *Transport 21*.

Population and Housing Targets in the GDA

The NTA supports the overriding policy direction set out in the RPGs, a continuation of the direction adopted by the 2004 RPGs, of focusing on the importance of relating investment in new housing and associated services to investment in public transport infrastructure. This is a key objective of the emerging NTA strategy.

The RPGs are adhering to the targets set out in the Department of Environment and Local Government (DOEHLG) Gateway and Hub Population Targets (October 2009)¹. The current downward trend in population growth² suggests that these projections may be revised as part of the RPGs review process.

The NTA would suggest that a potential overestimation of population growth in the GDA is not necessarily a problem, however if the projections are too high, careful consideration must be given to the mechanism used to apportion population growth.

Settlement Hierarchy (including retail and economic)

The NTA supports the key principles on which the RPGs Settlement Strategy is based, in particular those relating to development consolidation and supporting the use of public transport, walking and cycling. Related to this, the NTA fully supports the commitment of the RPGs to maintaining the existing Metropolitan Area boundary and to focus future growth into areas which are accessible to or serviceable by public transport and which are located within rail-based public transport corridors. In order to achieve this, development needs to be consolidated at the appropriate scale, that is, a strong focus on the Metropolitan Area and a small number of Hinterland Area development centres, within clearly defined development boundaries.

It is critical for the viability of key strategic transport and other service infrastructure, as well as compliance with the Department of Transport's *Smarter Travel (A Sustainable Transport Future)* policy document, that population and employment growth be concentrated at an appropriate scale within the catchment area of public transport and other services required at the local level. This offers the best potential for the services to function viably and economically. If there is a reduction in the population growth, even in the short term, it is especially important that the growth be consolidated into key centres, well served by public transport.

The NTA strongly favours the creation of a well balanced and well functioning settlement hierarchy, where development is consolidated at the appropriate scale and related in turn to a reduced need to travel, reduced car dependency and the availability of public transport as a feasible and attractive mode choice for trip making within centres and within the City Region in general. The benefits from a transport perspective of achieving these objectives are summarised under the three following headings:

- **Environment:** decreased journey distances, less car travel and reduced CO₂ emissions, consolidation of natural and built environment.

¹ DOEHLG, Regional Planning Guidelines Review – Gateway and Hub Population Targets (October 2009)

² CSO Population and Migration Estimates (22nd Sept 2009)

- **Social:** decreased journey times, more reliable journey times and reduced personal stress.
- **Economic:** greater agglomeration and economies of scale, as car use and congestion decreases, the labour pool within a given journey time increases as does access to key markets, suppliers and ports.

All of these benefits support the objectives of *Smarter Travel (A Sustainable Transport Future)*.

The NTA recommends that the identified Gateway Core, Metropolitan Consolidation Towns and Large Growth Towns, should be the focus of economic and social infrastructural development in the GDA. The NTA also recommends that the settlements identified in the hierarchy below the level of Large Growth Town should be modest in scale and cater primarily for locally generated population growth with a concomitant local focus in terms of market and non-market service provision and employment growth. The NTA recommends that where growth does occur in settlements below Large Growth Town, that it must be proportional to the scale of the settlement, its position within the RPG settlement hierarchy and public transport accessibility.

The NTA supports those policies in the Draft RPGs that seek to maintain and strengthen Dublin's function as the primary national and regional economic and service centre. The NTA would however draw attention to the fact that the Retail Planning Strategy for the GDA, was prepared and agreed between the local authorities in 2008. The NTA considers it essential that the retail hierarchy be linked to the settlement and economic hierarchy to ensure growth of major trip attractors such as retail at an appropriate scale. This will support the role of public transport, and also promote the potential for increased walking and cycling trips to retail, in line with the policy direction of *Smarter Travel (A Sustainable Transport Future)*. This could be achieved by including a policy statement which requires the retail strategy to be consistent with the RPGs.

The NTA recommends that the settlement hierarchy, economic centre hierarchy and retail hierarchy be closely aligned. This will be essential to achieve the above recommendations.

Transport Issues

The NTA supports the clear and emphasised connection made by the RPGs on the importance of integrating any decisions made on future transport, (particularly public transport) investment, with those pertaining to the location of housing, business and leisure developments. This is essential to ensure that the objectives of the RPGs can be achieved and that optimal economic, social and environmental value can be gained from investment by government in transport infrastructure and transport services. The NTA also welcomes the clear linkages in the Transport Section of the RPGs with the various policies/objectives set out in, *Smarter Travel (A Sustainable Transport Future)*, the National Cycle Policy Framework (produced by the DoT in 2009), the Transport 21 investment programme and reference to the forthcoming NTA Strategy.

The Dublin Transport Authority Act (2008) legislation requires the RPGs to be consistent with NTA Transport Strategy for the GDA. The NTA is aware of the RPGs requirement to develop a settlement hierarchy based on a set of strategic transport proposals, and would support the RPGs in the identification of key settlement centres located on strategic public transport

nodes. However, the NTA has a statutory requirement to produce a Transport Strategy for the GDA, which when completed will fully assess all transport proposals, including those stated in the RPG document.

The NTA recommends that until the NTA Transport Strategy has been completed, that the RPG's must refer to future transport schemes as "proposals" until they have been fully assessed and ratified as part of the NTA strategy and avoid assigning a particular level of importance to any uncommitted proposals, pending further analysis.

Public Transport

The NTA Strategy will provide the basis for the build out of strategic public transport infrastructure, the provision of local public transport services, and walking and cycling initiatives in the GDA. In doing so, it will reflect the principles and objectives of *Smarter Travel (A Sustainable Transport Future)*, and require an RPG settlement strategy that will coordinate and integrate with public transport services.

The need for a strong correlation between the scale of development and public transport accessibility will be strengthened by prioritisation of development into the upper tiers of the settlement hierarchy. In this regard the NTA totally supports the consolidation of development within the Metropolitan and Hinterland areas into the designated development centres. The RPGs should emphasise the requirement for public transport as the basis for significant increases in population, and emphasise the need for public transport provision to be focused on servicing the key trip attractors (large scale employment centres, schools/colleges, retail centres, health and leisure facilities).

In addressing the requirements of rural and peri-urban areas, currently poorly served by public transport, the RPGs should be informed by and make particular reference to those members of the community where physical mobility and accessibility to employment, services, etc. is an issue (e.g. lower socio-economic groups, elderly, disabled) and also to tourists/visitors who may have no other choice but public transport. The RPGs must however, reflect the significant constraints in providing public transport in these areas, particularly financial and infrastructural. The RPGs should highlight these issues as a key reason for the need to control and contain development in rural areas, and for focusing growth into designated centres, which will facilitate the development of a critical mass of population that can support the viability of providing effective public transport.

Park and Ride

The NTA will consider the role of park and ride as part of the NTA Strategy. This will examine and identify appropriate locations for park and ride with the GDA. The NTA recommends that the RPGs should make reference to the role of the NTA in the final document.

Road Transport

The NTA would reiterate the fact that the NTA Transport Strategy will provide an implementation plan for the build out of strategic transport, including road construction and improvements in the GDA. The NTA Transport Strategy will reflect the input from the

Department of Transport, the National Roads Authority and Local Authorities and as such will have fully considered in the appraisal process, new roads and road upgrades proposed by these agencies during the consultation process. It is the view of the NTA that the RPGs should refer to the role of the NTA strategy in relation to identifying the strategic requirements for specific new road schemes, or road improvements within the text of the document.

Walking and Cycling

The NTA suggests that the section relating to 'walking and cycling' should be strengthened and prioritised to reflect the commitment made by *Smarter Travel (A Sustainable Transport Future)* to these modes.

Although the higher order settlement centres and the Metropolitan Area in general, have the greatest potential to increase the mode share of walking and cycling, on account of the greater proximity between trip origins (residential) and a wide range of trip destinations (work, school, college, shops, etc), this should not exclude the promotion and facilitation of increased walking and cycling in rural towns and villages. The RPGs should promote the provision and facilitation of walking and cycling as part of their rural transport strategy, including the identification of key linkages between town centres and surrounding built up areas, and improvement and provision of safer good quality footpaths / cycle facilities.

The RPGs should incorporate reference to the potential for walking and cycling tourism within the GDA. The RPGs should highlight the opportunities, and promote the role of local authorities, in cooperation with other state bodies, such as Failte Ireland, CIE and Waterways Ireland. Example schemes could include identifying and facilitating the development of walking and cycling amenities which would encourage tourism, particularly with regard to off road recreational footpaths, cycleways, river and canal side footpaths and cycle paths, and the potential of accommodating bicycles on trains.

International Gateways (Ports and Airports)

The NTA acknowledges the key role of Dublin Port and Dublin Airport as Ireland's largest international gateways and their economic importance at both a national and regional level. Cognisant of the 'Dublin Port National Development Plan Study', the NTA supports the Draft RPGs recommendation for an;

'Examination of the expansion of Dublin Port and a new Port facility on the coast of the GDA through the environmental and planning process to clarify the viable options available to provide for future needs and in addressing the impact of future development on Natura 2000 sites, landscape and biodiversity.'

Freight

The National Spatial Strategy (2002) stresses the importance of access to international markets for goods, and given the strategic importance of the Dublin City gateway as both the economic hub of the region and the state, the NTA considers the planning for, and

facilitation of, freight movement to be a critical issue for the GDA. The NTA is aware that, at this point in time, the level of research and policy direction on freight traffic and movement is limited. The NTA will examine the role of freight and freight management as part of the NTA Traffic Management Plan.

Parking Management

As part of Transport Strategy the NTA will examine and make recommendations regarding parking provision and parking management in the GDA. The NTA recommends that the RPGs make reference to the potential of travel demand management to support more sustainable travel behaviour. Travel demand management is seen as a key requirement to encourage people to switch from the private car to more sustainable transport modes such as walking and cycling, or public transport.

Travel demand management will be a key element of the forthcoming NTA Transport Strategy, and the NTA recommend that the RPGs could include a policy statement in the text which refers to the potential role of travel demand management in the sustainable development of settlement centres.

Parking standards have traditionally been the remit of local authority development plans, and although it is ultimately through county development plans and local area plans that they will be adopted, the RPGs should provide guidance at a regional level, in order to coordinate and standardise parking standards across the seven local authority areas, based on accessibility criteria.

The introduction of maximum parking standards at a region-wide level represents a key transport demand management measure, of particular importance when influencing mode choice for trip-generating uses such as office, retail and education. The definition of standards as maxima rather than minima is critical, as is the level at which maximum standards are set.

Monitoring and Indicators

The NTA welcomes the introduction of indicators that will be used to monitor the application and effectiveness of the policy objectives and recommendations set out in the RPGs. However, the NTA would raise a number of concerns about the indicators, as presented in Appendix A2 of the RPGs.

Although availability of data and the use of resources is an important consideration in the selection of indicators, it is vital that the indicators chosen actually provide a useful and objective gauge against the policy or objective that is being assessed. In this regard, the NTA have a number of concerns about the indicators as set against the policies/recommendations in Appendix A2 of the RPGs. For example:

- Under Settlement Strategy, which will assess the implementation of SP1 (supporting smarter travel, consolidation etc.), one of the proposed indicators is the '*distance travelled to work (less than 24 km)*'. The NTA does not see this by itself as a good measure of success for this strategic recommendation. To determine the progress made towards the achievement of *Smarter Travel (A Sustainable Transport*

Future) targets and increased development consolidation, this indicator must be linked to measures which set out changes in 'Mode Share' and also 'Trip Distribution'. The only way of achieving transport objectives over time is to monitor indicators across a range of trip lengths for example, 0-5km, 5-10km, 10-15km and 15km+.

- Under Economic Development, which will assess the implementation of ER4 (Entrepreneurship and Enterprise), one of the indicators set out in RPGs Appendix A2 is a measure of '*the number of science/incubator and innovation parks per county*'. This is counter intuitive, as since the RPGs are trying to consolidate development, especially of major trip attractors (as in policy recommendation SP1), it would be preferable to have fewer (larger) centres, located into key settlements.

The NTA raises these issues as an example of how the indicators highlighted in this draft report need to be refined, or clarified, in order to ensure that they can be used to measure the progress of the RPGs effectively. The NTA also suggests that, in selecting and refining the indicators to be used in the final RPGs, the RPG office liaises with the NTA, who as part of the proposed NTA Transport Strategy, will also be devising a set of indicators to be used in the monitoring of NTA policies and objectives.

Given the close interrelationship between the RPGs and the NTA Transport Strategy, these indicators should be agreed between the NTA and the RPG Office and applied to both, in their respective monitoring processes. Consistency in the monitoring process would substantially contribute to the over-riding objective of coordinating transport and land use planning in the GDA.

NTA Recommendations.

Based on the above, the NTA makes the following specific recommendations.

1. Development outside the major centres presents a significant risk to the achievement of the objectives of *Smarter Travel (A Sustainable Transport Future)*. The current RPG can be interpreted such that significant development could take place away from the planned public transport network. The scale of development below Large Growth Centres must be limited to ensure the level of growth is related to its existing population. The RPG should stipulate that the core strategies prepared by the local authorities must set out the appropriate allocation of housing for each level in the hierarchy.
2. To ensure that the retail strategy is consistent with the settlement strategy, the RPG should include a policy statement which requires the application of the policies and objectives of the retail strategy be consistent with the policies and objectives of the revised RPGs. The NTA recommends that the settlement hierarchy, economic centre hierarchy and retail hierarchy be closely aligned.
3. The NTA recommends that the RPGs include a set of maximum regional parking standards for the GDA. The RPGs should reference the fact that these standards

should be seen as a maximum, and that the application of more restrictive parking standards could be sought in areas with good public transport accessibility³.

4. The projects in Chapter 6, Table 9 should not be referred to as “critical” or “Imperative”. All references to future transport projects should only be referred to as “proposals” in the RPG document and for consideration in the NTA Transport Strategy.
5. A number of specific textual amendments are set out in Appendix 2.

³ An example set of maximum regional parking standards, taken from the DTO ‘Greater Dublin Area Travel Demand Management Study’ (2004), is included in Appendix 1.

Appendices

Appendix 1

DTO – GDA Travel Demand Management Study (2004) (p.55)

Table 6.2: Proposed Maximum Regional Parking Standards (non residential use)

	Maximum Parking Standard (per gross floor area unless otherwise specified)	Threshold from and above which standard applies (gross floor space)
Employment, including offices	1 space per 30 m ²	1,500 m ²
Food retail	1 space per 14m ²	1,000 m ²
Non food retail	1 space per 20 m ²	1,000 m ²
Cinemas and conference facilities	1 space per 5 seats	1,000 m ²
Higher and further education	1 space per 2 staff + 1 space per 15 students	2500 m ²
Stadia	1 space per 15 seats	1,500 seats

Appendix 2

Specific alterations proposed by the NTA

The following statement made with reference to Moderate Growth Towns should be revised to reflect all transport connections:

*'Economic opportunities through good **transport** connections, good social infrastructure and strong local labour market should be capitalised on to attract a range of enterprises. Key sites and facilities should be identified that are fully serviceable and available for encouragement of economic investment opportunities.'* (RPGs p.74)

PIR4

This recommendation does not fully reflect the role of the NTA in terms of the legislation set out under Section 95 of the Dublin Transport Authority Act 2008 and the related amendments to the Planning and Development Act 2000.

There is a requirement on the part of local authorities to summarise the issues raised, and recommendations made by the NTA at the various consultation phases, when preparing, drafting and varying development plans. The local authority, must, at each stage, recommend how the NTA's issues and recommendations should be addressed. The onus is also on local authorities, within the GDA, to ensure development plans and local area plans are consistent with the NTAs Transport Strategy. This requirement should be reflected in this strategic recommendation.

PIR5

This strategic recommendation must reflect the requirement to identify and protect all strategic transport links; the NTA would recommend that the wording be changed to reflect this. The NTA would suggest the following alteration to text. 'Plans and policies should identify and protect **transport** corridors...'

Rather than referring to potential long term problems with junction capacity and conflicts between urban development and road schemes, a proactive approach should be promoted in the RPGs which would recommend that specific locations on the strategic transport networks be identified and their development potential (scale, uses, phasing) assessed, against a range of criteria, including:

- Accessibility requirements (public transport, access to the national road network, etc.)
- Assessment against the principle transport functions of the related transport infrastructure (national primary roads, heavy rail lines, multi-modal interchange nodes, etc.)

PIR6

This recommendation should be expanded to take into consideration all areas that are not well served by public transport, particularly rural, peri-urban and suburban areas. There should also be reference to members of the community where lack of accessibility can be a

significant problem and has the effect of increasing social and economic exclusion (elderly, mobility impaired and disabled).

PIR7

This strategic recommendation should refer directly in the text to 'support for the delivery of high quality **public** transport links to Dublin Airport'.

PIR9

The NTA supports the inclusion of specific targets in this strategic recommendation in relation to cycling (at least 10% cycle mode share by 2020) which is considered appropriate, particularly in the context of the Metropolitan Area and the large growth towns. It should also stipulate a requirement for local authorities in the GDA to formulate county cycle guidelines with the objective of meeting and exceeding this minimum target.