

Senior Planner  
Planning Department  
Kilkenny County Council  
County Hall,  
John Street,  
Kilkenny.

15<sup>th</sup> June 2018

**Re: Kilkenny County Development Plan 2020-2026 – Issues Paper – Public Consultation**

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Kilkenny County Development Plan 2020-2026 Issues Paper and submits the following comments for consideration.

#### **1. Guiding Principles:**

The NTA recommends that the preparation of the Development Plan should be guided by and include land use policies and objectives, which support the consolidation of urban-generated development within existing urban areas, in complement with the integration of land use and transport planning:

- For urban-generated development, the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations. This is of particular relevance to the largest urban areas, including Kilkenny City and the Ferrybank/ Waterford City Environs area;
- To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised;
- Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas;
- As intensively used, central locations, the management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport

modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life;

- 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 for local trip making;
- The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;
- Where possible, new residential developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and private vehicle access while restricting or discouraging private car through trips;
- Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport;
- The strategic transport function of national roads should be maintained and protected in accordance with national policy;
- All non-residential development proposals should be subject to maximum parking standards;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied – of particular relevance to the larger urban areas; and
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance.

## **2. Public Transport**

In terms of public transport service provision, the NTA has statutory responsibility for securing the provision of public passenger land transport services which, with respect to Kilkenny City & County, would relate to:

- A Public Service Obligation (PSO) contract between the NTA and Irish Rail;

- A PSO contract between the NTA and Bus Eireann;
- Direct award contracts for the operation of bus services; and
- The licencing of commercial bus services.

### Kilkenny City

The NTA's Public Transport Services (PTS) Division has developed a bus network for Kilkenny City. The contract for the operation of the two routes is currently out to tender. The network comprises two routes, one of which will serve College Road/Old Callan Road proximate to the Western Environs area. There is potential for the new bus network to be modified in the future to take account of new development areas and associated new demand for travel, if the layout of the new development facilitates bus operations.

In regards to development in Kilkenny City, the effectiveness of bus based public transport services in meeting the demand for travel will very much depend on the extent to which the city's expansion is achieved on the basis of consolidation within the existing settlement boundary, in combination with the objectives set out under points 1 and 2, above.

### Rural Development and Rural Transport

The rural economy and the rural social fabric should be supported through the provision of better local connectivity and connectivity to services and commercial activities located in cities and towns. In addition to this, urban-generated development in rural areas needs to be managed in such a way so as to safeguard the integrity of rural areas and to support the accommodation of urban-generated development within urban areas.

The NTA provides rural transport services through the *Local Link Rural Transport Programme*. The key priorities of this programme continue to be directed at addressing rural social exclusion and the integration of rural transport services with other public transport services. The programme mission statement is '*to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs*'. The services provided under the programme are therefore intended to fulfil a primarily social function, in meeting the needs of communities outside of defined settlements.

The NTA will develop and expand the Local Link Rural Transport Programme in the following manner:

- seek further integration with other public transport services, including HSE and school transport;
- ensure fully accessible vehicles operate on all services;
- enhance the customer experience;
- increase patronage among children and young people; and
- encourage innovation in the service.

It is recommended that the Development Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns.

### **3. Strategic Road Network**

The quality of the strategic road network in Kilkenny and connectivity to it, has been substantially improved over the last two decades.

The NPF sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the imperative to improve and protect the strategic function of the TEN-T core and comprehensive network.

In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that any development objectives should be in accordance with the DOECLG *Spatial Planning and National Roads Guidelines* (2012), and that this should be referenced in the Development Plan.

Symbiotic to this, National Policy Objective 74 seeks to *“Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes”*. National Strategic Outcome 2 of the National Planning Framework indicates the need for *“Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements”*.

### **4. Parking Standards:**

#### Car Parking

As stated above under Section 1, the NTA recommends that car parking provision for non-residential land uses should be stated as maximum standards rather than minimum requirements. In addition, in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.

#### Cycle Parking

Cycle parking at trip origins and destinations is a key factor in determining mode choice, and should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate facilities are provided.

The Development Plan should therefore include specific policies on cycle parking in the urban realm and in private developments. In this regard, the NTA recommends the *Standards for Cycle Parking and Associated Cycling Facilities for New Developments* document issued by Dun Laoghaire-Rathdown County Council in 2018, which includes comprehensive guidance on the design of cycle parking.

([http://www.dlrcoco.ie/sites/default/files/atoms/files/dlr\\_cycle\\_parking\\_standards.pdf](http://www.dlrcoco.ie/sites/default/files/atoms/files/dlr_cycle_parking_standards.pdf)).

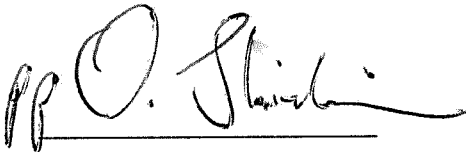
## 5. National Transport Authority Guidance Documents

In addition to the above recommendations, the NTA recommends that the preparation of the Development Plan is informed by the following NTA guidance:

- The National Cycle Manual;
- Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers;
- Toolkit for School Travel; and
- Guidance Note on Area Based Transport Assessment (NTA and TII).

I trust that the views of the NTA be taken into consideration in the preparation of the Draft County Development Plan, and would be available to discuss issues arising from the comments made.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael MacAree', written over a horizontal line.

**Michael MacAree**  
Head of Strategic Planning