

Development Plan Review,
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23rd December 2022

Re: Material Amendments to the Draft Clare County Development Plan 2023-2029

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Material Amendments to the Draft Clare County Development Plan 2022-2028. The NTA acknowledges the incorporation of many of the recommendations made in our submission on the draft plan and submits the following comments for consideration in relation to the material amendments.

1. Limerick Shannon Metropolitan Area Transport Strategy (LSMATS)

The LSMATS was published by the NTA in December 2022. It sets out the framework for the delivery of the transport infrastructure and services required to serve the LSMA in a sustainable manner with a focus on public transport, walking and cycling. While it applies to a relatively small geographical area of Clare, this area includes Shannon Town, Airport and Free Zone and provides for the sustainable development of Limerick City and Suburbs, which is a major centre for employment and services for the County. The NTA welcome the greater commitment given in the Development Plan to the implementation of the LSMATS in Chapter 4 and Chapter 11.

NTA Recommendation

The NTA recommends that all Material Amendments which relate to the LSMATS; to strengthening the link between land use planning and transport planning; and, in general, to the implementation of the measures within the LSMATS, are retained in the final County Development Plan.

2. Core Strategy – Section 3.4.2

The NTA notes the text on page 18 referring to growth projections being treated as targets but not caps or limitations. It is not clear whether this statement is to be viewed in the context of the additional provision as provided for by the Development Management Guidelines or if this approach is intended to facilitate growth in settlements above and beyond that provision and in a manner that would not be fully plan-led. It would appear, from the Core Strategy table, that the latter appears to be the case.

NTA Recommendation

The NTA recommends that the text of this section is reviewed and that the Council clarify that development in the County would be fully plan-led and would not simply respond to the objectives of individual landowners or developers without clear reference to the Core Strategy and the principles and objectives of compact growth and accessibility to sustainable transport.

3. Phasing

Similar to point 2, there appears to be a diminution in the role of planning envisaged by the insertion on page 19 related to phasing. The definition of “lands which are within or contiguous to the built-up area of settlements” would be critical in this regard. If such a definition was tightly bounded by the existing urban footprint, such a statement would be acceptable, however if it relates to the entire urban area as defined by the settlement plans, it would cause concern and may lead to development leap-frogging to peripheral sites.

For example, there are a large number of peripheral sites zoned for development in the various settlements, with additional sites proposed in the Material Amendments, the cumulative impact of whose development may be significant in terms of compounding legacy transport issues, in particular car dependency. The phasing of the development of these sites would facilitate a more structured approach to the planning of services for current and future populations. This relates to both residential and commercial development.

NTA Recommendation

As the phasing of growth is a key function of the proper planning and sustainable development of settlements, the NTA recommends that the text on page 19 is deleted and replaced with text which states that the growth of all settlements will be undertaken in a sequential manner and based on accessibility to services by sustainable transport modes.

4. Additional Residential Zonings

The NTA has some concern in relation to the extent of additional zoning proposed in the Material Amendments. It is noted that, compared to the Draft Development Plan, an additional 9ha is zoned for residential development in Ennis; an additional 3ha in the Metropolitan Area (excluding Shannon and the SDZ); 8.5ha in the Service Towns; and over 20 additional hectares in the Small Towns.

As referenced in point 2 above, It is not clear from the material provided how the extent of additional residential zoning is consistent with the following:

- Development Plan Guidelines;
- National Policy Objective 74 of the National Planning Framework as it relates to the National Development Plan’s Strategic Outcomes 1 and 5 (Compact Growth and Sustainable Mobility); and
- General principles of proper planning and sustainable development.

NTA Recommendation

The NTA recommends that the significant quantum of residential zonings proposed in the Material Amendments are reconsidered in the context of the requirement for such a quantum of zoned land for housing supply, and the likely long-term transport implications of development at these peripheral locations in terms of the delivery of National Strategic Outcomes 1 and 5.

5. Additional Commercial Zonings

The NTA note the zoning of large sites close to the national road network for Enterprise (ENT4 and ENT5). These zonings would facilitate a range of uses of varying intensity and transport implications, including Data Centres (as per Material Amendment) and Offices. As peripheral sites which will present challenges in terms of sustainable transport objectives, it is not clear from the material presented how Clare County Council envisage development at these sites “*rebalancing transport movement in metropolitan areas and other urban centres away from the private car and towards active travel and public transport*”, as set out in the *National Sustainable Mobility Policy*.

Additionally, as major rezonings close to the M18 and N85, the potential impact of their development on the national road network has not been presented in the Development Plan. The NTA would draw the local authority’s attention to the Department of Housing, Local Government and Heritage’s *Spatial Planning and National Roads Section 28 Guidelines*, and any recommendations made by Transport Infrastructure Ireland, in this regard.

NTA Recommendation

The NTA recommends, in the event that the large scale rezonings for Enterprise in Ennis are maintained in the final Development Plan, that a policy objective is inserted which states that their development is conditional on a demonstration of consistency with the Department’s *Spatial Planning and National Roads Section 28 Guidelines*. It is further recommended and that a policy objective is inserted which states that development of the zoned sites can only proceed in a manner which meets the objectives of the *National Sustainable Mobility Policy* through, *inter alia*, the following:

- The application of reduced parking standards;
- Investment in walking, cycling and public transport infrastructure and services (including, if appropriate, site-specific shuttle buses provided by the occupiers); and
- The commitment to a range of behavioural change measures as outlined in Area-Based Workplace Travel Plans to be submitted as part of any proposal for development.

6. Concluding Remarks

The NTA has engaged closely with Clare County Council through the making of the LSMATS and in various land use planning and transport planning matters in the County. The above observations and recommendations are intended to assist the Council in aligning the Development Plan more closely with the principles of land use and transport integration and the objectives to promote sustainable transport. I trust that the views of the NTA will be taken into consideration in the next stages of County Development Plan process, and we would be available to discuss issues arising from the comments made.

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning