

Submission No: 129.



Development Plan Review,
Planning Department,
Clare County Council,
New Road,
Ennis,
Co Clare,
V95 DXP2

16th November 2020



Re: Clare County Development Plan 2022-2028

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the *Clare County Development Plan 2022-2028 Issues Paper* and based on the policies and objectives of the Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS); the Regional Spatial and Economic Strategy (including the Metropolitan Area Strategic Plan) for the Southern Assembly; and on national policies and guidelines, submits the following comments for consideration.

1. Overview

The NTA recognises that the LSMATS relates to only a portion of County Clare, including Shannon and a number of other settlements. Notwithstanding the geographic remit of the LSMATS, the NTA recommends that the guiding principles; overarching policies and objectives; and the general approach of the LSMATS, which is to seek greater integration between land use planning and transport planning and to promote public transport, walking and cycling, while seeking to reduce car use, should guide development in all of County Clare, and should form the basis for the direction of transport investment.

2. Guiding Principles for the Integration of Land Use and Transport Planning

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.

Such policies and objectives should reflect the following:

- 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;

- 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;
- 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.

3. South Clare Economic Strategic Development Zone

The NTA recognises the objective of Clare County Council to develop the South Clare Economic Strategic Development Zone, as provided for in the RSES. On this basis, development at this location

was assumed in the preparation of the LSMATS. In the event of development proceeding at this site, the draft LSMATS seeks to serve it through a combination of increased bus services from Limerick City and Clare, and the development of the metropolitan cycle network. The Limerick Northern Distributor Road (LNDR) would also serve this site and would provide for bus services and cycling.

Due to the peripheral location of this site and the potential convenience for access by private car from the M7 and proposed LNDR, it is essential that a broad range of measures for these lands aimed at reducing car use and promoting walking, cycling and public transport, are agreed as part of the Development Plan, which would then be incorporated into any emerging masterplan or planning scheme.

In particular, the NTA recommends that any policy objective in the Draft Development Plan to develop these lands includes the following:

- That the development of this site would be governed by a Masterplan or Planning Scheme agreed between the landowners, Clare County Council, Limerick City and County Council, Transport Infrastructure Ireland (TII) and the NTA;
- The impact of the proposed development on the national and strategic road network is fully assessed, and any mitigation measures are agreed with TII and the NTA;
- Car parking will be provided at a rate below that provided for in the County Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;
- Cycle parking will be provided for in all residential developments at a rate which will cater for all future residents;
- Cycle parking will be provided in all non-residential developments to cater for at least 10-20% of all trips to be made by this mode;
- All non-residential developments will include end-of-trip cycling facilities for employees such as showers and lockers;
- All new roads would incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;
- A full public transport strategy is agreed with the NTA and all requirements in terms of facilities, such as stops, layover, driver welfare, shelters etc. are accommodated;
- All new roads will seek, in the first instance, to provide for filtered permeability, in order to avoid creating additional capacity for car traffic and to prevent any through traffic; and
- The Masterplan or Planning Scheme, and all subsequent development proposals would include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.

4. Local Transport Plans for Key Settlements

Objective SM1 of the Draft LSMATS provides for the preparation of Local Transport Plans (LTP), particularly for urban settlements and large scale development areas and as such would recommend its inclusion as a development plan objective. The LTP would represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of compact smart growth. It is intended that LTPs would:

- Maximise the opportunities for the integration of land use and transport planning;
- Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;
- Plan for the efficient movement of people, goods and services within, to and from the Plan area;

- Identify the extent to which estimated transport demand associated with local development objectives can be supported and managed on the basis of existing transport assets; and
- Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.

5. Cycling and Cycle Parking

It is recommended that the Cycling Objectives of the Draft LSMATS, at a minimum, are fully incorporated into the Draft Development Plan and that additional similar objectives are derived which would apply to those settlements outside the Metropolitan Area, to which the LSMATS does not apply. It is further recommended that policies and objectives (including infrastructure) which support and promote cycling in the LSMA but which may not have appeared in the Draft LSMATS, are considered for inclusion by the local authority if identified as part of the Development Plan process, in particular within Shannon.

In relation to cycle parking, the NTA recommends that the Council should consider the *Standards for Cycle Parking and associated Cycling Facilities for New Developments* published by Dun Laoghaire-Rathdown County Council, in order to inform development management objectives related to such facilities.

6. Walking

Walking plays a significant role in County Clare, in particular for short trips. It is clear, however, that in many places, the network provided is inadequate from both a safety and convenience point of view. The Draft LSMATS provides the policy framework for significant enhancement to pedestrian facilities across the LSMA, and in a similar manner to cycling, it is an imperative that the Draft Development Plan includes those policies and objectives and applies them at a County and settlement level for County Clare as a whole.

7. Bus

Bus is the most important mode of transport for serving travel demand between all settlements in County Clare, and demand *within* the larger settlements, in a sustainable manner, and the role of this mode will grow in importance in the future. Accordingly, the Draft LSMATS provides for a radically improved bus system for the LSMA, including a comprehensive network of bus priority measures and enhanced services in Shannon. The NTA recommends that the maximum degree of clarity around potential bus measures for the whole County are included in the Draft Development Plan as follows:

- To provide bus priority measures where required to eliminate delays to vehicles at the following locations:
 - The R471 in Shannon;
 - Within Shannon Town Centre;
 - Ennis Town Centre; and
 - Any other locations in County Clare identified by the NTA or Clare County Council during the period of the Development Plan.

Additionally, the NTA is committed to on-going review and enhancements to the inter-city, regional and commuter services and it is recommended that an objective is included in the Draft Development Plan reflecting the requirement to facilitate such service improvements.

8. Provision of Public Transport Services in Rural Areas

This is a matter of particular importance for Clare, given the rural nature of large parts of the county and an associated pattern of small urban settlements and large rural hinterlands. 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 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 Draft 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. Policies and objectives to support the role of rural transport should be included in the Plan.

9. Rail

The preparation of the Draft LSMATS included a detailed and comprehensive analysis and assessment of the potential for rail and light rail to play a significant role in the transport system within the LSMA. The outcome of that analysis was clear in that, beyond catering for increased demand on the inter-city and regional lines, the development of a commuter rail or light rail network was not viable in the LSMA, as the scale of population growth, and its proposed distribution and density, does not support any significant investment in a comprehensive suburban commuter rail system.

Given the economic importance of Shannon Free Zone and Shannon Airport, and their potential for significant growth in the long-term however, the NTA recommends that the existing reservation for a heavy rail link to these locations is retained in the Draft Development Plan.

10. Strategic Road Network

The NPF and Draft LSMATS set out the importance of maintaining, improving and protecting the strategic function of the key transport corridors.

In this regard, 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”. This is reflected in Objective RS4 of the Draft LSMATS.

In order to protect the strategic transport function of the national roads, including motorways, the NTA recommends that 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.

The Draft LSMATS also facilitates the progress of a number of national and strategic road schemes within Clare as follows:

- N19 Upgrade;
- Improvements to interchanges on the M18; and
- Limerick Northern Distributor Road.

It is recommended that these schemes are provided for by way of specific objectives in the Draft Development Plan.

Limerick Northern Distributor Road (LNDR)

In relation to the LNDR, the NTA strongly recommends that the full wording of the Draft LSMATS is included in any contextual material and / or policy objectives related to the delivery of this road in the Draft Development Plan. This wording is as follows:

The LNDR is assumed to have the following functions:

- *To support bus, cycling and pedestrian priority measures in the Metropolitan Area by accommodating private vehicle trips accessing residential areas and employment destinations in urban Limerick, UL and other services;*
- *Provide direct connectivity for the private car and public transport from Shannon and UL, the NTP and the SDZ;*
- *Provide for potential bespoke bus services from Galway and Shannon Town and International Airport to UL, SDZ and the NTP;*
- *Provide an additional access point for traffic and potential public transport from the M7 to UL and the NTP without the use of the Dublin Road and Plassey Park Road; and*
- *Provide multi-modal connectivity to cater for demand from Clare and Galway to UL and the NTP.*

Subject to the appraisal outcomes, it is assumed to have the following characteristics:

- *60kph speed limit;*
- *Single carriageway with provision for car in both directions;*
- *Provision for bus priority in both directions;*
- *Provision for pedestrians and cyclists in both directions;*

- Full provision for cyclists and pedestrians at all junctions;
- At grade junctions; and
- Accesses into Plassey, UL, SDZ, Corbally, Parteen and Moyross.
- Access onto M7 at J28;

In terms of land use planning policy, although the LNDR will be a Regional route, it will be treated in a similar way to National roads and the Spatial Planning and National Roads Guidelines will be applied to potential changes to land use policy on this corridor.

With the exception of the proposed SDZ in South Clare and the growth of a small number of settlements in line with the County Core Strategies and RSES, according to the principles of proper planning and sustainable development, significant development along the LNDR will not be supported, and its strategic functions (as set out above) will be protected.

11. Parking Standards

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.

12. Transport Accessibility

The *National Planning Framework* recognises that social inclusion can be improved in the transport sector through, among other things, universal design. For example, *Technical Guidance Document M of the Building Control Regulations 2010* includes the objective to provide independently accessible means of approach to buildings. The accessibility of the built environment, transport infrastructure and transport services for all users, including those with mobility impairments and disabilities, should be a key consideration in the Development Plan.

Enabling universal access and facilitating and promoting universal design should be a key consideration in the development plan, as it relates to transport policies and objectives. Making the external built environment accessible to all can facilitate and promote the greater use of public transport, walking and cycling. The use of universal design in the external built environment can benefit all within society including those with specific mobility issues and requirements.

The NTA recommends that specific objectives should be included in the Plan requiring that Accessibility Audits be carried out for new developments and transport infrastructure, including bus stops and taxi ranks, to ensure they provide adequately for all users. Objectives which promote universal design in the external built environment such as providing separate pedestrian entrances, the provision of dropped kerbs and tactile paving will provide a safer and more attractive environment for all. In relation to parking standards, the NTA recommends that the provision of a minimum of 5% of car parking spaces as accessible spaces.

13. Development Plan Indicators – Mode Share

It is recommended that the Development Plan includes sustainable transport indicators, including mode share, for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators. The NTA would be happy to work with Clare County Council on the development and analysis of sustainable transport indicators, in conjunction with the Office of the Planning Regulator.

14. 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).

15. Other Matters

The Draft LSMATS contains a wide range of supporting measures and objectives which are intrinsic to the development of a sustainable transport culture and to the integration of land use planning and transport planning County Clare, but which may not be appropriate as stand-alone policies and objectives of the Development Plan. The NTA recommends therefore that a general overarching objective is included in the Draft Development Plan which outlines a commitment to the implementation of the policies and objectives of the LSMATS for that portion of Clare within the LSMA, once finalised.

16. Concluding Remarks

The NTA is committed to maintaining and enhancing the cooperative approach with Clare County Council which has defined the development of the Draft LSMATS to date, and to expanding that relationship to integrated land use and transport planning across the County. The NTA will be available for further consultation with the Council as the LSMATS is finalised throughout the Development Plan process.

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

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning