

Forward/Strategic Planning,
Limerick City and County Council,
Merchants Quay,
Limerick

Dún Scéine, Lána Fhearchair
Baile Átha Cliath 2, D02 WT20

Dún Scéine, Harcourt Lane
Dublin 2, D02 WT20

t 01 879 8300

info@nationaltransport.ie
www.nationaltransport.ie

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Re: Adare Local Area Plan – Issues Paper – Public Consultation

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the *Adare Local Area Plan Issues Paper* and submits the following observations for consideration.

1. Strategic Overview

The NTA note the status of Adare as a Large Village in the Limerick settlement hierarchy and its role as a visitor destination. While Adare is outside the Limerick Shannon Metropolitan Area, the Transport Strategy (the "LSMATS") is of relevance to the settlement, along with the plans and programmes of the NTA more generally. With this in mind, it is recommended that the Local Area Plan take full account of the following overarching considerations:

- The implications for Adare of the Foynes to Limerick Road scheme (including Adare bypass), and any other potential road scheme, in terms of the potential enhancement of the walking and cycling environment within the settlement arising out of the removal of through traffic, further to those enhancements which will be pursued in the short-medium term; and
- The reopening of the Foynes rail line for freight as provided for in the LSMATS Measure RL4.

2. Guiding Principles

The NTA recommends that the preparation of the Local Area 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, as follows:

- The development of Adare should be based on the "Avoid-Shift-Improve" principle; the "Decide and Provide" approach to the planning and design of transport networks; and the general objectives of the 10-minute town concept;
- The Local Area Plan should seek the reallocation of road space in appropriate locations in accordance with the road user hierarchy, in order to prioritise walking, cycling and public

transport use and prioritise the placemaking functions of the urban street network in advance of the completion of the Adare bypass or any other road links relevant to the village;

- In accordance with the NPF and RSES, development patterns which seek to consolidate development should be supported and prioritised as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services;
- Peripheral development should be supported only in exceptional circumstances – on an evidence-based planned approach – where located on public transport routes and for specific land uses that cannot be accommodated in the town centre;
- Major new “out-of-town” retail developments should not be supported;
- Large-scale office developments should not be supported at more peripheral and / or less accessible locations;
- Land use policies which seek to provide for an appropriate mix of uses at the district and neighbourhood level should be supported;
- The Local Area Plan should ensure that the road and street networks in new development areas are designed on the basis of providing for filtered permeability, and should incorporate measures which deliver filtered permeability in existing neighbourhoods;
- The Local Area Plan should ensure that access by walking, cycling and public transport is a key determinant in the location of new schools;
- The Local Area Plan should ensure that new roads within the settlement are provided as a means to serve new development only and are designed in such a way as to facilitate and promote walking, cycling and public transport, and which prevent through movement by private car;
- Planning for new schools and the expansion of existing schools should ensure that the detailed design is undertaken in a manner which maximises the priority for pedestrians and cyclists. Access, footpaths, cycle parking and car parking (if required) should all be arranged so as to eliminate, as far as practicable, interference and conflict between pedestrians, cyclists and motorists;
- Where car parking is provided it should be located to the rear or side of school campus in order to reduce the potential for safety hazards and to reduce the visual dominance of cars within the school environment and on the streetscape;
- Set down or drop-off areas are not encouraged in close proximity to schools, unless there is no safe alternative area, including on the public road, within a short walk where cars can park safely and with a footpath link to the school; and

- Planning applications for new schools or the expansion of existing schools should only be supported where it has been demonstrated that the road network in the vicinity of the proposed development facilitates, or is planned to facilitate, safe and convenient walking and cycling access to the school.

3. Movement at Settlement Level – Local Transport Plans or Studies

The NTA recommends that the Local Area Plan should incorporate and be developed in tandem with the preparation of a Local Transport Plan or Study (LTP). It is recommended that this process is informed, at the appropriate level for a settlement of this scale, by the NTA/TII document *Area Based Transport Assessment*.

<https://www.nationaltransport.ie/strategic-planning/guidance-documents/>

The LTP represents 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 LTP/S's 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.

4. Movement at Inter-Settlement level

While movement at inter-settlement level will largely be dealt with at the Development Plan level, there is also an opportunity to explore the commuting patterns to and from Adare as part of the Local Transport Plan. This may help to identify the transport infrastructure and services that are required to serve the town. The commuting profiling can be used to better understand the relationship between current land use patterns and associated travel patterns. In doing so, it can also usefully inform both the formulation of land use policies which can affect more sustainable travel pattern outcomes, as well as the transport infrastructure and services need to meet future inter settlement travel demand.

5. Provision of Public Transport Services in Rural Areas

The *Connecting Ireland: Rural Mobility Plan* is a major national public transport initiative that will increase connectivity, particularly for people living outside the major cities. The plan aims to improve mobility in rural areas and settlements such as Adare. It will provide better connections between villages and towns by linking these with an enhanced regional network connecting cities and regional centres nationwide. Connecting Ireland will seek to improve the current transport network by:

- Enhancing existing services;

- Adding new services and;
- Enhancing the current Demand Responsive Transport (DRT) network.

The NTA continues to also provide 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 Local Area Plan acknowledges the role regional and 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, in particular, the Connecting Ireland plan should be included in the Local Area Plan.

6. Walking and Cycling

In order to realise the required modal shift to sustainable modes, the appropriate policies and objectives need to be carried through at a local level where specific measures can be identified. The Local Transport Plan, as informed by the ABTA process, will focus on the identification of the required networks and measures to bring about improvements for sustainable modes. The LTP should identify the weaknesses in the walking and cycling networks in the settlement and the measures required to provide safe and efficient routes from origin (housing) to destination (school, work and services). The LTP/S can identify measures such as permeability and junction improvements and footpath and cycle track upgrades required.

At a national level, several funding streams have been announced which specifically target improvements in the built environment for walking, cycling and other public realm measures which will assist with the realisation of the measures that could be identified as part of the LTP. The NTA will continue to work with the local authorities on foot of the LTP/S’s to bring identified measures to fruition through appropriate funding mechanisms. One such funding stream is the Safe Routes to Schools programme, which aims to make the journey to school by sustainable modes a safe and attractive choice for students and their parents. The importance of the journey to school and enabling this journey to be completed by walking and cycling should be a key priority for the LTP/S and Local Area Plan.

7. 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.

Enabling universal access and facilitating and promoting universal design should be a key consideration in the Local Area 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. Objectives which promote universal design in the external built environment such as providing separate pedestrian entrances, the provision of dropped curbs and tactile paving will provide a safer and more attractive environment for all.

8. National Transport Authority Guidance Documents

The NTA recommends that the preparation of the Local Area Plan is informed by the following NTA guidance, available on the NTA web site:

- The National Cycle Manual (to be updated during the preparation of the LAP);
- Permeability: A 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).

9. Indicators – Mode Share

It is recommended that consideration is given at the Local Area Plan level to include sustainable transport indicators, including mode share, for the purpose of monitoring the effectiveness of policies and development objectives. The NTA would be happy to work with Limerick City and County Council on the development and analysis of sustainable transport indicators, in conjunction with the OPR.

Conclusion

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

Yours sincerely,



Michael Mac Aree

Head of Strategic Planning