Mr. Liam Conneally,
Director,
Mid-West Regional Authority,
Friar Court,
Abbey Street,
Nenagh,
Co. Tipperary

1st March 2010

Re. Mid West Draft Regional Planning Guidelines 2010-2022

Dear Sir,

The National Transport Authority (NTA) submits the following comments on the Mid West Region’s Draft Regional Planning Guidelines 2010-2022. In this, the NTA places a critical emphasis on the intrinsic link between proper planning and sustainable development and the role of walking, cycling and public transport as modes of transport across all trip purposes. As such, it is imperative that the RPG for the Mid West and across the State support the targets, policies and objectives of the National Spatial Strategy, Smarter Travel and support the capital investment programme set out in Transport 21.

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, by regional authorities across all regions of the State.

Although the legislation does provide a critical consultative role to the NTA in the making of RPGs, in the case of the Mid West, it is noted that the process has already progressed to Draft stage. Under the circumstances and given the very recent establishment of the NTA, the primary intention of this submission is to set out a number of general observations on the Draft RPG, which are based on the objective of delivering transport in the most effective manner from a social, environmental and economic perspective.

Overall approach to the Draft RPG’s Settlement Strategy

The targets set out in the Government’s Transport Policy Smarter Travel – A New Transport Policy for Ireland 2009-2020, (see Appendix) place a greater obligation on the urban areas of the State to affect a radical shift from the use of the private car to other modes. This change in travel behaviour has a greater potential to occur in larger towns and cities than in smaller towns, villages and rural areas. This is in part, due to the greater prevalence or potential for shorter trips to work, school, etc. within these towns and the associated feasibility or availability of alternative modes of transport. Associated with this, the consolidation of future
development into existing urban areas at densities which support public transport services would therefore be regarded by the NTA as being critical in meeting national transport objectives.

Consistent with the NSS, the NTA would see Limerick City / Suburbs and Shannon as the Gateway and economic driver for the Mid West Region, with Ennis performing a secondary and discrete role as the Hub for its hinterland. The role of Limerick / Shannon as a regional employment hub, an industrial centre, a regional transport hub in terms of the national road and rail networks and an international gateway in terms of its seaport and airport functions should be maintained and strengthened in line with the National Spatial Strategy. A policy of development consolidation within the urban centres of the Limerick / Shannon gateway can therefore perform a critical role in achieving the Government’s sustainable development objectives as they relate to land use and transport planning.

Any policies in the RPG which undermine the ability of the Gateway settlements to maximise their potential in attracting population, employment, education and services would be regarded as contrary to Government Policy and detrimental to the economic potential of the Mid West region.

Transport

Rail
The NTA welcomes the policies of the RPG which aim to support the capital investment programme for rail set out in Transport 21 and to make provision for future investment in rail based public transport. The consolidation of regional population and employment growth in the Limerick/Shannon Gateway and hub town of Ennis would support the basis for investment in rail service improvements, along this section of the Western Rail Corridor (a Transport 21 project). The growth of rail passenger numbers between Limerick and Ennis may in turn, provide a stronger basis for inter-regional rail services linking hub towns and gateways along the Western Rail Corridor.

Bus
In relation to Bus, the proposed hub and spoke type approach to services within the region would seem to be the most appropriate way to maximise the potential of public transport, in providing quality bus services linking Limerick City and Shannon with other urban centres in the region. The proposed use of bus priority measures for Gateway/Hub services, could significantly contribute to a modal shift from car to public transport for trips between the Gateway and the region’s hinterland towns.

Cycling
Given the relatively short distances pertaining to trips made within any of the urban centres in the region, cycling is seen by the NTA as having a very significant potential for growth in local trip making. The promotion of cycling for local trip making is consistent with the objectives of Smarter Travel (A Sustainable Transport Future) and the National Cycle Policy Framework, which aims to increase cycle mode share to 10% of all trips by 2020.

As alluded to earlier, the higher order urban areas such as Limerick, Shannon and Ennis have the greatest potential in the region to exceed this mode share target on account of the greater
proximity (i.e. shorter distances) between trip origins (residential) and trip destinations (work, school, college, shops, etc) as compared to those undertaken from smaller towns, villages or sparsely populated rural areas.

As such the RPG, through the Development Plan process, would be more closely aligned to national transport policy were they to contain a clear set of policies and objectives relating to the promotion of cycling.

Freight
The National Spatial Strategy stresses the importance of regional access to international markets for goods. Given the strategic importance of the Limerick-Shannon gateway as both an economic hub and an international gateway (discussed above under Overall Approach), specific consideration should be given in the RPG to freight movements within the Mid West region, and between the Mid West and other regions. This would relate, in particular, to the role of Shannon/Foynes and Shannon Airport and their linkages to the wider regional and national markets. Additionally, the emerging role of the Mid West as a transport hub of national importance, should also be considered with regard to freight movement, situated as it is, at the convergence of road and rail / future rail corridors linking with international gateways in the South East, South West and the Greater Dublin Area and with major urban centres in the West and North West.

In particular, the potential for rail freight in the Mid West could also be examined as part of the RPG in conjunction with the Department of Transport and rail freight operators.

Retail
The NTA supports the policies of the draft RPG which seek to maintain and strengthen Limerick’s function as the region’s primary retail centre and the development of a retail hierarchy which reflects the region’s settlement hierarchy. However, consistent with the Retail Planning Guidelines, the RPG should contain objectives which positively support the growth or retention of retailing in established city and town centres, as a basis for development consolidation and the promotion of non-car modes for retail and related (or linked) trips made to facilities accessible at the local level.

Next Steps:
As stated in the introductory remarks, this submission should be considered as an introductory comment, setting out the primary transport issues as the NTA currently sees them, in relation to regional planning in the Mid West. The NTA would welcome the opportunity to meet with you, to discuss the issues raised in this submission and to establish a basis for future working arrangements.

It is intended that the NTA will over time, establish a research and analysis capability at a national level, from one which is currently focused on the Greater Dublin Area and in this way, would anticipate a growing role in assisting in the making of regional planning guidelines, which support government objectives in relation to transport planning and investment.
If you have any further questions at this stage, in relation to the role of the NTA in the regional planning process, I would be happy to discuss.

Yours Sincerely

Gerry Murphy
Chief Executive Officer
APPENDIX

Smarter Travel

Introduction

Smarter Travel A New Transport policy for Ireland 2009-2020 is the Government’s overarching strategy for transport to the year 2020. This appendix presents a number of Smarter Travel targets and actions that the NTA deem necessary for consideration by the Regional Authorities in making Regional Planning Guidelines. The actions referred to have been presented in an abbreviated form.

Selection of Smarter Travel Actions

Integration of Spatial Planning and Transport

In terms of the relationship between Land Use planning and transport, Smarter Travel emphasises the importance of the full integration and alignment of transport plans with the development plan process and local area planning.

To be included in future planning guidelines:

- ... significant housing development in all cities and towns must have good public transport connections and safe routes for walking and cycling to access such connections and local amenities

- Integration of cycling and public transport

- Promotion of... development ... on brownfield/existing sites to consolidate urban growth and enable organic development of urban areas from the centre out

- Ensuring a general minimum housing density of between 35 and 50 dwellings per hectare in urban areas ... and ... substantially higher densities ... in high capacity public transport corridors

- Specification of a maximum permitted level of car parking for commercial sites...

- A requirement that developments above a certain scale have viable travel plans in place

- A requirement that development in urban rail corridors be high density and appropriate for public transport use...

- Guidance on the incorporation of cycling and walking policies in development plans

- A general restriction of the future development of out-of-town retail centres...and consideration of a similar requirement that parking charges be introduced for most existing centres

- Encouragement of the use of local area plans and strategic development zones (SDZs) within major urban areas as a way of improving the land use-transport interface, particularly to ensure that employment and residential centres are co-located.
- LUTS-type strategies ... The emphasis in the first place will be on the Gateways followed by LUTS-type studies for the Hub locations in the National Spatial Strategy.

- Local authorities to prepare plans to retrofit areas towards creating sustainable neighbourhoods so that walking and cycling can be the best options for local trips.

- We will ensure that every school and college in Ireland has a school travel plan to encourage students to take alternatives to the car.

- Workplace Travel Plans encourage employers and employees to take steps to reduce dependency on the car and to take alternative transport options. ...

- Personalised Travel Plans aimed at citizens in areas served by public transport

**Movement of Goods**

In relation to the movement of goods, Smarter Travel includes the following actions:

- ... target aimed at reducing the environmental impact of freight while at the same time improving efficiency in the movement of goods and promoting economic competitiveness

- ... explore in greater depth the issues relating to the movement of goods ...:

**Public Transport**

In relation to the public transport, the following actions apply:

- Implement more radical bus priority and traffic management measures to improve the punctuality and reliability of bus services ...

- Provide better bus parking facilities in smaller towns and villages and bus shelters in rural areas Complete studies into the feasibility of Bus Rapid Transit systems and/or Light Rail Transit systems in Cork, Galway, Limerick and Waterford and act on the results

- a reliable urban bus service in significant urban areas ...

- A bus route/stop within 800 metres of a house in an urban area

- A schedule which commences at 6 a.m. and finishes at 1 a.m., 7 days a week depending on demand

- A frequency of at least 10 minutes at peak hours and 20 minutes at non-peak hours

- ... a regular 7-day a week transport service for rural communities and those in smaller urban areas

- Examine the potential for the expanded use of school and other publicly funded buses
- developing the Rural Transport Programme to expand the network in other ways, such as demand responsive services

- Provide park and ride facilities at the edge of major and intermediate urban centres and at important public transport nodes, with efficient transport connections to the urban centre

**Cycling**

*Smarter Travel’s* vision for a strong cycling culture, includes the following issues to be addressed:

- The creation of traffic-free urban centres to facilitate cycling

- Investment in a national cycle network with urban networks given priority

- Integration of cycling with other transport modes, e.g. carriage of bicycles on public transport

**Walking**

In relation to walking, the actions below are contained in *Smarter Travel*

- ... ensure that urban walking networks are strengthened ... providing safe pedestrian routes, ... providing routes, which serve employment and education trips and that link with public transport

- ... reducing waiting times and crossing distances at junctions

- Creating larger traffic-free areas in urban centres

- ... 30 km/h zones ... in central urban areas ...

- Widening footpaths where there are high pedestrian flows, particularly close to public transport nodes ...

- Providing appropriately designed safe, well-lit, direct, continuous facilities

- Signposting pedestrian routes to important intra-urban destinations ...

**Delivery at Regional and Local Level**

Building on the LUTS approach ... empower local authorities to prepare transport plans to complement their development plans. The transport plans will set targets for achieving sustainable travel and transport services in their areas.

... require regional authorities to incorporate targets for shifts to sustainable travel modes in the next statutory review of the Regional Planning Guidelines.