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11th October 2019

RE: Northern and Western Regional Assembly – Material Amendments to the DRAFT Regional Spatial and Economic Strategy (RSES)

Dear Mr. Minton,

This submission has been prepared by the National Transport Authority (the “NTA”) in response to the publication of the proposed Material Amendments to the Draft RSES, and in accordance with section 31GG of the Planning and Development Act (2000, as amended) (the “Planning Act”).

The NTA has been working with the Northern and Western Regional Assembly to ensure that the issues of concern to the NTA are satisfactorily addressed in the Draft RSES. On examination of the proposed Material Amendments to the Draft RSES, the NTA is of the opinion that, in general, it satisfactorily addresses the issues raised in the *NTA Issues Report* of January 2018 and the NTA submission dated 8th February 2019, and that it provides a solid basis for the integration of land use and transport planning at regional, metropolitan area and at settlement levels.

As such, this submission is primarily supportive of the proposed Draft RSES, while reiterating a small number of recommendations made in the NTA submission of 8th February 2019 which have yet to be incorporated into the Draft RSES. These recommendations are set out below:

Chapter 3 People and Places

Section 3.6 (A) Galway Metropolitan Area Strategic Plan (MASP)

The NTA welcomes the clear reference to, and emphasis on, the implementation of the Galway Transport Strategy (GTS) and Galway City Centre Transport Management Plan (CCTMP).

Recommendation

In relation to Public Bus Transport (p.77), the RSES should make direct reference to ‘BusConnects Galway’, which is a Strategic Investment Priority as set out in the National Development Plan 2018-2027).

Section 3.6 (C) Strategic Plan for Sligo

The NTA have noted that the draft RSES references the term MASP in relation to Sligo in a number of sections. It is important for the integrity of the urban hierarchy, as outlined in the NPF that the function and status of the MASP areas is restricted to the Regional Cities of Dublin, Cork, Limerick, Galway and Waterford.

The NTA considers it important that Local Transport Plans (LTPs) are referenced specifically in the context of the Strategic Plan for Sligo. The Strategic Plan for Sligo, as outlined in the draft RSES, does not clearly identify the requirements for, or implementation of, local public transport services, walking and cycling priorities in the context of Sligo Town. The NTA are content that these issues can be adequately addressed through the LTP mechanism; however it is important that this is clearly referenced in the RSES.

Recommendation

- Remove references to 'MASP' in relation to Sligo Town.
- Make reference to the need for a Local Transport Plan (LTP) for Sligo Town and Environs, and note that this will set out the investment and implementation priorities for transport within the Strategic Plan area.

The NTA, as always, are available to meet to discuss these comments in advance of finalisation of the RSES.

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning

Encl:

1. *Report by the National Transport Authority on matters to be taken into consideration in the preparation of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly ('NTA Issues Report')*
2. *NTA Submission Dated 8th February to the Draft RSES*

Report by the National Transport Authority
on matters to be taken into consideration in
the preparation of the *Regional Spatial and*
***Economic Strategy* for the Northern and**
Western Regional Assembly

January 2018



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Introduction

This report has been prepared by the National Transport Authority (the “NTA”) in response to the notification sent by the Assembly, dated 11th December 2017, and in accordance with Section 31FF of the Planning and Development Act (2000, as amended)¹.

A key principle of the NTA in relation to strategic planning is to ensure that investment by the State is informed by better policy integration, so as to maximise the return on a given level of investment through the achievement of greater synergies. In the case of transport, in which the RSES will have a role in guiding capital investment in infrastructure & the provision of services, as well the regulation of activities & services, the NTA advocate an approach guided by the principles of *efficiency, effectiveness and sustainability*.

To ensure consistency of approach and assistance with each Regional Assembly, the NTA has addressed the issues which should be taken into account by the RSES under the following headings:

- (i) Transport Investment Priorities for the NTA;
- (ii) The Scope to Maximise the Performance of the Transport System by Effective Land Use Planning;
- (iii) Recommendations Regarding the Optimal Use, Location, Pattern and Density of New Development; and
- (iv) Matters to be addressed in the RSES to ensure the effective integration of transport and land use planning.

It is proposed that this report be used as a basis for the NTA’s input into the preparation of the RSES, by the Northern and Western Regional Assembly.

¹ Section 31FF states that in the case of a regional assembly outside the GDA, the NTA shall prepare and submit a report on the issues which, in its opinion, should be considered by a regional assembly in the making of RSES.

1. Transport Investment Priorities for the NTA

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 the Northern and Western Regional Authority, 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.

In addition, part of the NTA's function in regards to public transport, is the management of the Rural Transport Programme and the successor structure of Transport Co-ordination Units to provide rural public transport services.

In terms of investment in sustainable transport infrastructure, the NTA manages a Regional Cities Sustainable Transport Grants Programmes on behalf of DTTAS, for the Metropolitan Area of Galway. These five yearly investment programmes provide for the funding of a broad range of sustainable transport interventions.

The NTA also manages other capital investment programmes relating to public transport, on behalf of DTTAS, including the procurement of buses (for Bus Eireann operations) and the provision of certain supporting infrastructure such as bus stops and RTPI.

In terms of planning for and investment in transport infrastructure and services, the Draft NPF has proposed that the 'statutory arrangement between spatial and transport planning in the Greater Dublin Area will be extended to other cities' (Objective 66). This points to a central role for NTA's in achieving 'mutual consistency' between the RSES and transport planning / investment, to be achieved through the preparation of transport strategies.

In the context of the NTA's existing and emerging functions, it is recommended that the following transport investment priorities are taken into consideration in the preparation of the RSES:

Transport Investment Priorities - Strategic Objectives

Through the National Investment Plan 2018-2027 and other funding instruments, the transport investment priorities of the NTA and other state agencies, should be to:

- support improved strategic and local connectivity;
- expand attractive public transport and other alternatives to car transport;
- recognise the role of the car and cater appropriately for it;
- reduce congestion; and
- cater for the demands associated with longer term population and employment growth, in a sustainable manner

This can be achieved by:

- a) Supporting the achievement of 'compact, smart growth' through the achievement of 'mutual consistency' between land use and transport planning/ investment/ service provision.
 - Related to this, it is recommended that the RSES include a policy objective which promotes the application of higher development densities in appropriate locations, with an associated consideration being given to reduced constraints on building height;
- b) Strengthening public transport, walking and cycling accessibility / connectivity within Galway City and environs;
- c) Strengthening public transport connectivity between Galway City, Dublin and the other regional cities with improved services and reliable journey times;
- d) Strengthening inter-regional connectivity, through the improvement of inter-urban road and rail connectivity, with a particular emphasis on improved connectivity between the largest urban centres and access to ports and airports, for the movement of both people and goods;
- e) Protecting the capacity of inter-urban road connectivity within and around the largest cities, ports and airports, through effective traffic management and transport demand management;
- f) Strengthening public transport connectivity between the Assembly Area's city and large towns, and between the large towns, with improved services and reliable journey times;
- g) Providing public transport infrastructure and services to meet the needs of smaller towns, villages and rural areas; and
- h) Developing a comprehensive network of safe cycling routes in the three cities / associated metropolitan areas, and to provide similar facilities in other towns and villages, where appropriate.

These strategic objectives and associated transport investment priorities are addressed, in greater detail, below, under the following categories:

- Metropolitan Area;
- Large Towns;
- Inter-Urban and Inter-Regional Connectivity;
- Access to International Gateways;
- Rural Transport;
- Walking and Cycling; and
- Transport Demand Management Measures which Complement Investment in Transport Infrastructure and Services

Metropolitan Areas

As detailed in Section 4, of this report, it is recommended that MASPs, with their associated Transport Strategies will inform the integration of land use and transport planning and associated transport investment and service requirements, as a basis for achieving the Draft NPF objective of 'smart, compact growth'.

As the largest urban settlement in the Northern and Western Regional Assembly area, Galway City has a critical role in the economic and social growth of the region. In order for Galway City to develop sustainably, and to ensure that transport investment is managed in a coordinated and financially prudent manner, it is critical that Galway Transport Strategy (GTS) is implemented in full.

The NTA requests that the GTS, and its full implantation, is given specific and detailed reference within the RSES. If deemed applicable, projects identified in the GTS could be highlighted, including:

- Implementation of the public transport 'cross city link' from University Road to College Road;
- Implementation of revised bus network;
- Implementation of cycle network, including expansion of City Bike Scheme;
- Implementation of Core city centre traffic management plan;
- Development of Park and Ride sites; and,
- Completion of N6 Galway City Ring Road.

Large Towns

Through the mechanism of the Local Transport Plan, detailed in Section 4, below, it is recommended that the RSES include an objective to support and develop local public transport services in the larger towns, the delivery of which would involve the development and implementation of local bus network plans, identify key routes, destinations and associated services and supporting infrastructure requirements.

Inter Urban and Inter-Regional Connectivity

Recommended objectives for inclusion in the RSES relating to Inter-Urban and Inter-Regional connectivity are set out under points c), d), e) and f), above.

The NTA supports the development / improvement of critically enabling road and rail infrastructure, and public transport services for the movement of people and goods, as provided and managed through the relevant delivery agencies and service providers, including Transport Infrastructure Ireland (TII), Irish Rail, local authorities and licenced public transport providers.

Access to International Gateways

The importance of accessibility to international gateways, located both within and outside of the Northern and Western Assembly Area, for people and internationally traded goods / services should be reflected in the RSES and supported through the inclusion of points d) and e), above.

In this regard, the NTA supports the development of critically enabling road and rail infrastructure for the movement of people and goods, as provided and managed through the relevant delivery agencies, including Transport Infrastructure Ireland (TII), Irish Rail, local authorities, licenced hauliers and public transport providers.

Rural Transport

The NTA manages and funds seventeen Transport Co-ordination Units (branded as Local Link) across the country. Nationally, this serviced delivering up to 250,000 rural transport service trips in 2016. Given the extensive nature of the Northern and Western Assembly Area's rural hinterland areas, it is critical that the RSES acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/ rural areas and larger towns. The NTA therefore recommends that the need for, and provision of rural public transport services is referred to in the RSES, as meeting the needs of rural communities and supporting the role of towns in serving their rural catchments.

Providing for local trip making

The achievement of accessibility for all is of critical importance, through the most effective and inclusive mix of mobility opportunities, and by association, the most appropriate provision for walking, cycling, public transport, commercial traffic and the private car. For local trip making within both urban and rural areas, the manner in which transport infrastructure is designed and managed can have a very significant bearing on modal choice and accessibility to services and facilities at the local level. In doing so, the key challenge, in transport investment, is to achieve the most appropriate balance between how car and non-car modes are provided for.

Among the modes most amenable to local trip making but most vulnerable to lack of specific design consideration, are walking and cycling. For this reason, it is recommended that the RSES includes a policy framework for the provision of pedestrian and cycle infrastructure which delivers an appropriate level of safety, comfort and convenience, for users, at all levels of mobility.

Through the development of MASPs and Local Transport Plans (see Section 4, below), the NTA hopes to work with the NWRA and local authorities to develop and implement strategic pedestrian and cycle network plans.

The NTA would also support the inclusion of a specific policy in the RSES, to retain and preserve publicly owned disused rail corridors, which can be utilised in future for walking routes, greenways, whilst at the same time, not precluding their potential return to rail use.

Transport Demand Management Measures which Complement Investment in Transport Infrastructure and Services

The Management of Transport Demand is considered by the NTA to be an essential complement to transport investment and the achievement of 'mutual consistency' between land use and transport planning, at all levels. The complementary land use policies referenced in Section 3, below, are of overriding importance in the management of transport demand, as are the management of the strategic road network through fiscal and non-fiscal measures.

As an aspect of transport demand management, the NTA manages and operate a 'Smarter Travel Programme' on behalf of DTTAS, the objective being to facilitate and encourage the uptake of sustainable transport options. The NTA recommends that reference is be made in the RSES, to the

objectives of and benefits accruing from this programme for the NWRA Area, particularly in relation to Smarter Travel Workplaces, Campuses and the Green Schools Programme.

Ultimately, the full benefits accruing from transport investment will not be achieved, if transport demand management is not positioned at the heart of integrated land use and transport planning, from regional down to local level. It is therefore recommended that the RSES makes specific reference to the implementation of transport demand management measures which complement investment in transport infrastructure and services.

2. The Scope to Maximise the Performance of the Transport System by Effective Land Use Planning

A key challenge at this stage will be to identify the role of the RSES process in optimising the benefits accruing from existing transport assets and future investment in transport infrastructure and services.

A key principle of the NTA in relation to strategic planning is to ensure that investment by the State is informed by better policy integration, so as to maximise the return on investment through the achievement of greater synergies. In the case of transport, the RSES should have a central role in guiding capital investment in infrastructure & the provision of services and in this regard, the NTA would advocate an approach which is guided by the principles of *efficiency, effectiveness and sustainability*.

The scope to optimise the benefits accruing from existing transport assets and future investment in transport infrastructure and services will be determined by the extent to which the RSES can influence the location of development into those areas which effect a reduction in the need to travel, a reduction in car dependency and enable the greater use of public transport, walking and cycling in meeting the demand for travel. The location, pattern and density of new development, as directed by the Assembly Area's constituent planning authorities should therefore be guided by the RSES.

3. Recommendations Regarding the Optimal Use, Location, Pattern and Density of New Development

The guiding principle for future development will be that of consolidation into the existing urban hierarchy, in order to maximise the use of existing assets and services, and in order to prevent the further development of sprawl. The corollary to this is a corresponding restriction on urban-generated growth elsewhere, in particular rural areas and out-of-town locations which cannot be served efficiently by transport, or other services

For this reason, a key objective of the RSES should be to facilitate the consolidation of urban-based development and in this regard, the optimal use, location, pattern and density of new development should be guided by the RSES. To this end the NTA recommends that the following principles are incorporated into the RSES:

Strategic Planning Principles

- To the extent practicable, residential development 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;
- High volume, trip intensive developments, such as offices and retail, should primarily be focused into central locations within designed RSES urban centres;
- Except in limited circumstances, outside designed RSES urban centres trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed public transport;
- The strategic transport function of national roads, including motorways, will be protected by the full implementation of the “Spatial Planning and National Roads - Guidelines for Planning Authorities”;
- 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 considered; 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.

Local Planning Principles

- Planning at the local level should promote walking, cycling and public transport, by maximizing the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services (of particular relevance to the Metropolitan Areas and other higher order settlements), 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;
- Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips;
- 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. Accessibility by car does need to be provided for, but in a manner which complements the alternative available modes. Local traffic management and the location / management of destination car parking has a critical role to play in achieving the appropriate balance of provision between car and non-car modes, for movement into, out of and within town centre areas. The key outcome here is a town centre which is accessible, attractive, vibrant and safe, as a place to work, live, shop and engage in community life; and
- To the extent practicable, proposals for right of way extinguishments should only be considered where these do not result in more circuitous trips for local residents accessing public transport, or local destinations.

These principles can most effectively be applied, in summary, by focussing growth into medium-high density residential, commercial and mixed-use developments. These developments should be located

in locations accessible to other services, either in central locations within smaller settlements, or centrally /adjacent to public transport corridors in larger settlements.

The RSES should encourage the use of Local Area Plans or Strategic Development Zones to ensure the development of priority sites in a planned and sustainable manner. In particular the RSES should make reference to the large scale development opportunities within Galway City Centre (Docklands, Ceannt Station, Galway Harbour) and Ardaun on the outskirts of Galway City as locations where a clear, coordinated and phased approach to the implementation of land use development and complimentary transport would facilitate sustainable planning.

The NTA also suggests that the RSES emphasises the merits of infill and brownfield development within existing urban areas across the region for more intensive land uses. This could include the provision for taller buildings if deemed appropriate in the planning context.

4. The Matters to be addressed in the RSES to Ensure Effective Integration of Transport and Land Use Planning

It is recommended that the RSES sets out clearly the manner in which land use plans will ensure that transport matters above have been fully considered. In general, the Integration of Land Use and Transport Policies and meeting the need to travel, for the movement of both people and goods, this should be informed by the following Primary Goals:

- Reducing the need to travel;
- Reducing the distance travelled;
- Reducing the time taken to travel;
- Promoting walking and cycling; and
- Promoting public transport use.

Specifically, in relation to the urban hierarchy of the RSES, there are a number of ways in which this approach can be applied at different spatial scales:

Metropolitan Areas (MASPs)

There is a requirement for the RSES to provide a strategic focus on cities, through the preparation of Metropolitan Area Strategic Plans (MASPs). The MASP will provide a mechanism whereby the strategic spatial planning (including transport planning) principles, policies and objectives can be applied within designated metropolitan areas. The preparation of a MASP should be guided by the principles of sustainable development, consolidation, and with a view to provide for better integration of land use and transport. The MASP should dictate the local application of the RSES recommendations outlined in Section 3 above, and provide a level of detail which will allow for a detailed implementation plan to be prepared and for effective monitoring of implementation to take place.

In relation to the Northern and Western Regional Assembly, a MASP is required for Galway, which should be based on the Galway Transport Strategy (GTS), which was undertaken by Galway City Council and Galway County Council in conjunction with the NTA. The alignment and consistency of the RSES and the GTS is of paramount importance to the effective integration of transport and land use

planning within the only city region wholly inside the Northern and Western Regional Authority, and as such it is recommended that this relationship is clearly set out in the RSES.

If necessary, the NTA will work closely with the Regional Assembly and all other relevant agencies in developing a MASP if deemed necessary based on the final settlement hierarchy of the RSES. Given the future population projections, in conjunction with the cross boundary growth synergies, there may be a requirement to look at the need for a MASP to be prepared for Letterkenny (in conjunction with Derry City) and / or Athlone.

Local Transport Plans

The NTA recommend the preparation of Local Transport Plans (LTP), particularly for the larger towns located outside of the Galway MASP areas. 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 the Draft NPF's objective of 'compact smart growth'. It is intended that LTPs would be undertaken by the relevant local authorities, in conjunction with the NTA and 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.

Rural Areas

Development which supports the rural economy and the rural social fabric should be strongly promoted in the RSES. However, the phenomenon of urban-generated development and population growth in rural areas, which ultimately requires significant investment to serve this population and to facilitate long-distance commuting, should be addressed in the RSES, with a view to limiting a continuation of this trend and at the same time, supporting the DRAFT NPF objective of 'smart compact growth' in cities, large and smaller towns.

The NTA looks forward to working with the Northern and Western Regional Assembly in the preparation of the Regional Spatial and Economic Strategy and I trust that the views set out above will be taken into account during that process.

RSES Submissions,
Northern & Western Regional Assembly,
The Square,
Ballaghaderreen,
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Ireland

8th February 2019

RE: Northern and Western Regional Assembly – DRAFT Regional Spatial and Economic Strategy (RSES)

Dear Mr. Minton,

This report has been prepared by the National Transport Authority (the “NTA”) in response to the notification sent by the Assembly, dated 19th November 2018, and in accordance with section 31GG of the Planning and Development Act (2000, as amended) (the “Planning Act”).

Consistency of the RSES with the Issues Raised by NTA

Section 31GG of the Planning and Development Act states that:

(1) Where a notice is received by the NTA under section 24(4) from a regional assembly (other than the regional assemblies in respect of the GDA) the NTA shall, as part of any written submission on the draft regional spatial and economic strategy, state whether, in its view, the matters raised by it in its report under section 31FF are—

(a) satisfactorily addressed in the draft regional spatial and economic strategy, or

(b) not satisfactorily addressed in the draft regional spatial and economic strategy.

(2) Where in the context of subsection (1) (b) the NTA makes a submission, it shall indicate what amendments to the draft regional spatial and economic strategy it considers should be made to ensure effective integration of transport and land use planning.

This report, (*Report by the National Transport Authority on matters to be taken into consideration in the preparation of the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly*) (*‘NTA Issues Report’*), was submitted in January 2018 and is attached in Appendix 1 for information.

On examination of the Draft RSES, the NTA is of the opinion that, in general, it addresses the issues raised in the *NTA Issues Report* of January 2018 and that it provides a solid basis for the integration of land use and transport planning at regional, metropolitan area and at settlement levels.

As such, this submission is concerned primarily with providing additional clarifications and information which can be used by NWRA to amend the draft RSES in order to provide greater clarity, and to strengthen their potential in delivering on the RSES' strategic and local objectives. These recommendations are presented below:

Chapter 3 People and Places

Section 3.3

In general, the NTA supports the proposed Regional Policy Objectives (RPOs), as presented in the draft RSES, which place a strong emphasis on the need to consolidate development, as well as providing improved accessibility and connectivity through better integration of networks, including Public Transport Networks.

Recommendation

Given the critical importance of Galway City as a Regional City, the NTA suggest that direct reference to the Galway Transport Strategy 2016 (GTS) could be made within RPO 3.

Section 3.4 Urban Places of Regional Scale

In order to ensure that the development of larger urban settlements in the NWRA area develop in a coordinated and sustainable manner, particularly in relation to transport opportunities, it is important that the location and scale of new development is informed by the potential accessibility and connectivity of these locations. In this regard, the NTA recommends the development of Local Transport Plans (LTPs). Although LTPs are mentioned in Section 3.3 (and 6.9), it is the view of the NTA that the requirement for LTPs should be clearly stated as a specific RPO in Chapter 3.

Recommendation

Insert an additional RPO in Section 3.3 or 3.4 which addresses the need to:

“Prepare Local Transport Plans (LTPs) for each of the 12 identified Urban Centres (including Athlone), in collaboration with the National Transport Authority, and other statutory bodies as deemed necessary.”

Section 3.6 (A) Galway Metropolitan Area Strategic Plan (MASP)

The NTA welcomes the clear reference to, and emphasis on, the implementation of the Galway Transport Strategy (GTS) and Galway City Centre Transport Management Plan (CCTMP).

Recommendation

In relation to Public Bus Transport (p.77), the RSES should make direct reference to the BusConnects Galway, which is a Strategic Investment Priority as set out in the National Development Plan 2018-2027).

Section 3.6(B) Strategic Plan for Letterkenny, with Derry City and Strabane Cross Border City Region

The NTA welcomes the policies outlined in Letterkenny Section 5 (p.100) of the RSES relating to the investment in accessibility and connected places in relation to Letterkenny, and the wider North West City Region. Despite this the NTA would again emphasise the need to directly reference the requirement for, and function of, producing a LTP for Letterkenny and Environs. This should be clearly stated in Letterkenny Section 5. This should also be cross referenced in the Table on p.93.

Recommendation

- Make reference to the need for a Local Transport Plan (LTP) in Letterkenny Section 5.
- Cross reference the LTP with the Transport priorities set out in the Table of p.93 of the RSES.

Section 3.6 (C) Strategic Plan for Sligo

The NTA have noted that the draft RSES references the term MASP in relation to Sligo in a number of sections. It is important for the integrity of the urban hierarchy, as outlined in the NPF that the function and status of the MASP areas is restricted to the Regional Cities of Dublin, Cork, Limerick, Galway and Waterford.

As stated above in relation to Letterkenny, the NTA considers it important that LTPs are referenced specifically in the context of the Strategic Plan for Sligo. The Strategic Plan for Sligo, as outlined in the draft RSES, does not clearly identify the requirements for, or implementation of, local public transport services, walking and cycling priorities in the context of Sligo Town. The NTA are content that these issues can be adequately addressed through the LTP mechanism; however it is important that this is clearly referenced in the RSES.

Recommendation

- Remove references to 'MASP' in relation to Sligo Town.
- Make reference to the need for a Local Transport Plan (LTP) for Sligo Town and Environs, and note that this will set out the investment and implementation priorities for transport within the Strategic Plan area.

Section 3.6 (D) Strategic Plan for Athlone

As stated above, the NTA consider it important that LTPs are referenced specifically in the context of the each Strategic Plan area, including Athlone. The Strategic Plan for Athlone, as outlined in the draft RSES, does not clearly identify the requirements for, or implementation of, local public transport services, walking and cycling priorities in the context of Athlone Town. The NTA are content that these

issues can be adequately addressed through the LTP mechanism, however it is important that this is clearly referenced in the RSES.

Recommendation

- Make reference to the need for a Local Transport Plan (LTP) for Athlone Town and Environs, and note that this will set out the investment and implementation priorities for transport within the Strategic Plan area.

Section 3.7.9 Other Rural Areas

As stated in the *NTA Issues Report* of January 2018, the NTA would reiterate its concern that the RSES needs to enable a clear distinction to be defined between urban and rural generated housing demand. Development which supports the rural economy and the rural social fabric should be strongly promoted in the RSES. However, the phenomenon of urban-generated development and population growth in rural areas, which ultimately requires significant investment to serve this population and to facilitate long-distance commuting, should be addressed in the RSES, with a view to limiting a continuation of this trend and at the same time, supporting the NPF objective of 'smart compact growth' in cities, large and smaller towns.

Recommendation

The NTA suggest that a specific RPO is inserted into the RSES which addresses the issue of urban generated rural housing, in a manner which will 'restrict the development of rural housing based on clearly defined eligibility criteria. This should facilitate the requirements of the local rural communities, whilst controlling the pressures for urban influenced housing demand.'

Chapter 6 – Connectivity – Connected Region

The NTA welcome the emphasis placed on the need to create an attractive, and effective transport system in the NWRA area. To ensure that the prioritisation of transport development is coordinated in a sustainable and controlled manner, the NTA would recommend that the following Strategic Objectives, as previously outlined in the *NTA Issues Paper* (January 2018) are incorporated into the body of the text in Chapter 6.

Recommendation

It is recommended that a more broadly based list of strategic objectives is included in Chapter 6. In line with the *NTA Issues Paper*, the NTA would emphasise the following Strategic Objectives:

- *support improved strategic and local connectivity;*
- *expand attractive public transport and other alternatives to car transport;*
- *recognise the role of the car and cater appropriately for it;*
- *reduce congestion; and*
- *cater for the demands associated with longer term population and employment growth, in a sustainable manner*

This can be achieved by:

- i) Supporting the achievement of 'compact, smart growth' through the achievement of 'mutual consistency' between land use and transport planning/ investment/ service provision.
 - Related to this, it is recommended that the RSES include a policy objective which promotes the application of higher development densities in appropriate locations, with an associated consideration being given to reduced constraints on building height;
- j) Strengthening public transport, walking and cycling accessibility / connectivity within Galway City and environs;
- k) Strengthening public transport connectivity between Galway City, Dublin and the other regional cities with improved services and reliable journey times;
- l) Strengthening inter-regional connectivity, through the improvement of inter-urban road and rail connectivity, with a particular emphasis on improved connectivity between the largest urban centres and access to ports and airports, for the movement of both people and goods;
- m) Protecting the capacity of inter-urban road connectivity within and around the largest cities, ports and airports, through effective traffic management and transport demand management;
- n) Strengthening public transport connectivity between the Assembly Area's city and large towns, and between the large towns, with improved services and reliable journey times;
- o) Providing public transport infrastructure and services to meet the needs of smaller towns, villages and rural areas; and
- p) Developing a comprehensive network of safe cycling routes in the three cities / associated metropolitan areas, and providing similar facilities in other towns and villages, where appropriate.

Section 6.3 Cycling and Walking

Although it is mentioned in the introduction of Section 6.3 (p225), there is no specific section on Walking and Cycling set out in the draft RSES. For local trip making within both urban and rural areas, the manner in which transport infrastructure is designed and managed can have a very significant bearing on modal choice and accessibility to services and facilities at the local level. In doing so, the key challenge, in transport investment, is to achieve the most appropriate balance between how car and non-car modes are provided for.

Among the modes most amenable to local trip making but most vulnerable to lack of specific design consideration, are walking and cycling. For this reason, it is recommended that the RSES includes a policy framework for the provision of pedestrian and cycle infrastructure which delivers an appropriate level of safety, comfort and convenience, for users, at all levels of mobility.

Recommendation

- A specific section should be included in the RSES which sets out a clear policy framework for the provision of pedestrian and cycle infrastructure, which addresses the need to ensure an appropriate level of safety, comfort and convenience for users, at all levels of mobility.

- This section should make reference to published design manuals, included DMURS and the NTA Cycle Manual.

Section 6.9 Enabling Plans- Local Transport Plans (LTPs)

The NTA fully endorses the inclusion of this specific section setting out the role of LTPs. The NTA however recommends that within the body of text more clarification is added to better explain the function and use of LTPs. The NTA also request that a link to the Area Based Transport Assessment² (ABTA) guidance document is included within the RSES.

Recommendation

The NTA suggest that the following points are included under section 6.9 to clarify the role and function of LTPs:

LTPs will:

- 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.

In addition, the NTA requests that specific reference is made to the Area Based Transport Assessment (ABTA) guidance note, which is available on the NTA and TII websites:

(https://www.nationaltransport.ie/wp-content/uploads/2019/01/ABTA_Advice_Note.pdf)

The NTA, as always, are available to meet to discuss these comments in advance of finalisation of the RSES.

Yours sincerely,

Michael Mac Aree
Head of Strategic Planning

² The Area Based Transport Assessment (ABTA) Guidance Document prepared jointly by the NTA and TII sets out a step by step methodology for the assessment and development of local transport policy and interventions. The ABTA process can be used to assess transport requirements at different spatial levels, including the development of Local Transport Plans. The guidance document can be viewed on the NTA website at: https://www.nationaltransport.ie/wp-content/uploads/2019/01/ABTA_Advice_Note.pdf