

Forward Planning Section,  
Offaly County Council,  
Áras an Chontae,  
Charleville Road,  
Tullamore,  
County Offaly

6<sup>th</sup> October 2020

Re: **Draft Offaly County Development Plan 2021-2027**

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Draft Offaly County Development Plan 2021-2027* and, on the basis of the *Eastern & Midland Regional Economic & Spatial Strategy (EMRSES)* and national policies and guidelines, submits the following observations and recommendations.

### 1. Guiding Principles

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:

- 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;
- 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. 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.

These principles are reflected in the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regions, in both the Guiding Principles on the Integration of Land Use and Transport, and the Tiered Approach to Land Use Zoning.

## **2. Local Transport Plans**

The NTA acknowledges the inclusion of references to the preparation of Local Transport Plans (LTPs) for Tullamore in accordance with RPO 8.6 of the EMRA RSES. The Draft Plan states that, Local Area Plans (LAPs) will be prepared for Tullamore and Birr during the life of the Plan. The NTA recommends that an objective is included requiring that Local Transport Plans be prepared for all settlements for which an LAP will be undertaken.

The NTA, in conjunction with TII, published a guidance note on *Area Based Transport Assessment in 2019* ([https://www.nationaltransport.ie/wp-content/uploads/2019/01/ABTA\\_Advice\\_Note.pdf](https://www.nationaltransport.ie/wp-content/uploads/2019/01/ABTA_Advice_Note.pdf)). This document provides guidance on the preparation of Local Transport Plans that is applicable at a range of development scales and settlement types, and the NTA recommends that the proposed objective(s) relating to LTPs should make reference to this document.

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.

While it is stated that all proposed LAPs 'will be prepared during the life of this Plan', no timeline is stated for the preparation of LTPs. Given the critical need to integrate land use planning and transport planning as part of the forward planning and development management process, the NTA recommends that LTPs should be prepared in tandem with LAPs rather than subsequently, and that a timeline for the delivery of each LAP/LTP should be provided in the Plan. The NTA further recommends that the development of larger sites within the subject settlements should be contingent on the completion of the LAP/LTP process.

### 3. Heavy Rail

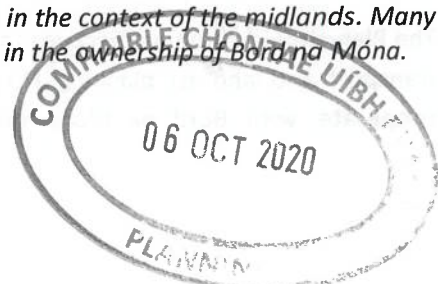
With regard to heavy rail infrastructure and services the Development Plan states the following:

*The 2030 Rail Network Strategy Review was published in 2011 and its purpose is to provide the Government with a basis for establishing a strategic policy framework for the future development of the rail passenger and rail freight sectors in Ireland.*

*The Review informs the strategic priorities and future investment strategy up to 2030 and the outstanding improvements in rail services to County Offaly include double tracking from Portarlington to Athlone (2020-2025) and the Electrification of Dublin to Galway line (2025-2030).*

*The provision of a rail link from Mullingar directly to Clara would create an integrated rail network linking Longford, Mullingar, Ballinasloe, and Athlone with Tullamore, Portarlington, Kildare and Portlaoise.*

*The final link in the network could involve the provision of a new rail line from Enfield to Edenderry with a continuation to Portarlington (possible junction at Garryhinch). This rail line, if provided, would be of great strategic importance in the context of the midlands. Many of the wayleaves between Portarlington and Enfield are in the ownership of Bord na Móna.*



The National Development Plan 2018-2027 does not currently include funding for the above projects. The Eastern and Midland Regional Spatial and Economic Strategy includes in objective RPO 8.8 to support the delivery of rail projects set out in Table 8.2. This includes to *'provide for an appropriate level of commuter rail service in the Midlands and South-East'*. While the Development Plan may contain the above mentioned objectives with regard to the provision of rail services, in the short-term and over the lifetime of the Plan, there is currently no provision or funding for such infrastructure.

#### **4. Provision of Public Transport Services in Rural Areas**

This is a matter of particular importance for Offaly County, 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:

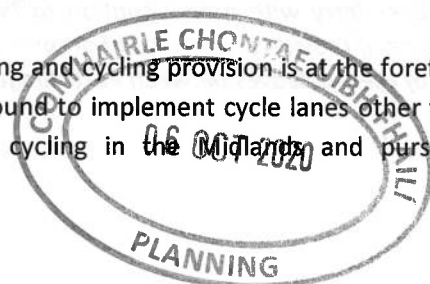
- seek further integration with other public transport services, including HSE and school transport;
- ensure fully accessible vehicles operate on all services;
- enhance the customer experience;
- increase patronage among children and young people; and
- encourage innovation in the service.

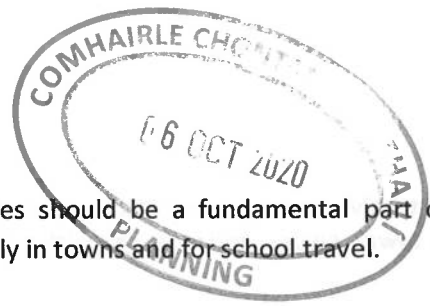
It is recommended that the Development Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. Policies and objectives to support the role of rural transport should be included in the Plan.

#### **5. Walking and Cycling**

The Development Plan should recognise the importance of sustainable modes of transport and plan for and make provision for these modes. The integration of land use and transport planning is key to ensuring that these modes are provided for. The Plan should seek to ensure that people are 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.

The Plan should contain objectives to ensure that walking and cycling provision is at the forefront of transport and land use planning. No objectives were found to implement cycle lanes other than to cooperate with Bord na Mona on their study for cycling in the Midlands and pursue the





development of greenways. The provision of cycling facilities should be a fundamental part of transport planning as a key enabler of active modes, particularly in towns and for school travel.

No objectives to improve walking and cycling facilities in the County were found other than a mention of the document *Connecting People Connecting Places*, which is a walking and cycling strategy aimed at tourism. Again, improving walking and cycling facilities in the County should be an objective of the Plan, in particular to encourage active modes within towns.

The Plan should seek to ensure that new development areas are fully permeable for walking and cycling and it should be an objective that the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to a give competitive advantage to these modes for local trip making.

## 6. Strategic Road Network

The NPF sets out the importance of maintaining, improving and protecting the strategic function of the key transport corridors including the imperative to improve and protect the strategic function of the TEN-T core and comprehensive network.

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*”.

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.

## 7. Car Parking

The NTA notes that policy DMS-102 Car Parking Standards includes that car parking spaces are stated as a requirement and further that where there is a shortfall that the Council may accept a financial contribution in lieu of the provision of car parking spaces.

Parking standards, particularly in their application at destination (e.g. employment, institutional, retail uses) have a critical role to play in the management of transport demand and can have a very significant impact on mode choice, between car and sustainable transport alternatives. While the Draft Plan includes car parking standards for a range of land uses, these are provided as fixed standards without reference to key considerations in determining parking standards such as public transport accessibility, locational characteristics (central, non-central, etc.), development density and mix of uses / functional complementarity with other land uses .

In this regard, the NTA recommends that residential parking standards should be expressed as maximum values, i.e. as rates not to be exceeded, to which degrees of constraint can then be applied. Related to this, the NTA recommends the inclusion of a mechanism that provides for more

restrictive parking standards in areas with good access to services, education and employment, such as town centres, and locations with good public transport provision.



## 8. Cycle Parking

It is noted that DMS-99 Cycle Parking Standards sets out a provision for apartments of 1 stand per unit and 1 visitor stand per 2 units. This is not specifically in accordance with the Department of Housing, Local Government and Planning's *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* which states the following:

*Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units.(pp24)*

The Guidelines also provide set out provisions for the quality of cycle parking including:

*Effective security for cycle storage is also maximised by the provision of individual cycle lockers and it is best practice that planning authorities ensure that either secure cycle cage/compound or preferably locker facilities are provided.*

It is noted that the Plan sets out that the ratio for cycle parking at rail stations is 2.5% of daily boarders at a station subject to a minimum of 10 stands. The NTA welcomes the requirement to provide cycle parking at public transport locations, and considers that the target could be higher at stations in town centres in particular.

The NTA also 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 additional development management objectives related to such facilities.

## 9. 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. While it is acknowledged that accessibility is discussed in Section 13.2.1, no specific objectives were found.

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 curbs and tactile paving will provide a safer and more attractive environment for all. In relation to parking standards, no specific requirement for accessible spaces

was found. The NTA recommends that the provision of a minimum of 5% of car parking spaces as accessible spaces.

#### **10. 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 Offaly County Council on the development and analysis of sustainable transport indicators, in conjunction with the OPR.

#### **11. Specific Suggestions – Policies & Objectives**

Offaly is one of the most rural counties in the region with a dispersed settlement pattern. To promote the use of sustainable transport throughout the county and ensure that public transport and active modes are a viable alternative to private transport we recommend that the Development Plan policies aim to:

1. Strengthen the use of existing public transport, and
2. Ensure that existing development can access corridors of existing / planned public transport alignments, and is permeable on foot / bike to the access points, and that future developments are located and laid out to achieve similar levels of access.

Offaly County Council can best encourage more use of public transport throughout the county, both within settlements and along interurban regional and local roads between them, through the development management process by:

- Requiring locations and layouts of development that generate demand for public transport and encourage travel on foot and by bicycle;
- requiring the provision of bus stops close to trip generators on regional and local roads, to minimise walking times for passengers;
- requiring pedestrian and cycle crossing points on roads, appropriately located relative to public transport stops; and
- requiring the provision of public transport bus turning and service regulatory layover facilities where required.

The following policies and objectives should be considered:

It is Council policy to ensure new development areas and employment land-uses are permeable for walking and cycling and are laid out in such a way as to facilitate the operation of and access to public transport by residents and employees;

It is Council policy to ensure that the layout and design of new developments provide for bus stops, passenger waiting facilities, and bus turning and service regulatory layover facilities, as required;

It is Council policy to support and develop public transport routes throughout the County through collaboration with the National Transport Authority;

It is an objective of the Council to retrospectively provide public transport, walking and cycling infrastructure and facilities in existing development areas to achieve growth in sustainable mobility; and





It is an objective of the Council to provide suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users.

Finally, for the proposed policy SMAP-06, we recommend that 'transport' be replaced by 'private transport', as follows:

**SMAP-06** It is Council policy to promote more compact development forms that reduce overall demand for *private* transport and *private* transport infrastructure and encourage modal shift towards sustainable travel modes.

#### Conclusion

I trust that the views of the NTA will be taken into consideration in the review of the Draft Offaly Development Plan.

Yours sincerely,



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Michael MacAree  
Head of Strategic Planning

