



Mr. Frank Pentony,
Development Plan Review,
Forward Planning Unit,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth.

16th December 2020

Re: Louth County Development Plan 2021-2027 – Draft – Public Consultation

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Draft Louth 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 Objective MOV 4 for the preparation of Local Transport Plans (LTPs) for Drogheda and Dundalk in accordance with RPO 8.6 of the EMRA RSES. The Draft Plan

states that, Local Area Plans (LAPs) will be prepared for the settlements of Drogheda and Dundalk. The NTA recommends that an objective is included requiring 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). 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.

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 Draft Development Plan states the following:

Whilst the Dublin-Belfast rail line passes through Dunleer there is no rail service in the town. It is recognised that Dunleer offers the potential for an improved rail service for the mid and south Louth areas. (Ch7, pp 9)

Policy Objective MOV 14 To secure, in co-operation with Iarnród Éireann, improved rail services for the mid and south Louth areas and in particular to seek to examine the feasibility of re-opening the rail station in Dunleer and providing additional new rail stations for south Dundalk, north Drogheda, and the mid-Louth area.

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 carrying out 'a feasibility study

of high-speed rail between Dublin Belfast, Dublin Limerick Junction/Cork'. It also includes the DART Expansion programme.

The DART+ programme includes for new DART services between the City Centre and Drogheda on the Northern Line and the purchase of additional trains to support the new and enhanced DART services. As part of the DART + Coastal programme, the provision of additional stations on this route may be examined at the time. However, there are currently no plans for the provision of additional stations outside the scope of the DART+ programme.

In relation to the provision of additional stations at locations outside the built-up areas of Drogheda and Dundalk, the provision of stations would require to be tied into an appropriate land use planning context to support the level of investment required to provide such infrastructure. The provision of rail stations is directly linked to the demand for services which would need to be sufficiently high to justify the investment. It would be expected that the land use zoning and densities proposed as part of the Development Plan would reflect the provision of high capacity public transport infrastructure. While the Core Strategy outlines the role of Dunleer as a self-sustaining growth town, it is not clear based on the current or projected population levels that the provision of additional infrastructure would be warranted.

While the Draft Development Plan may contain the above mentioned objectives with regard to the provision of additional stations, in the short-term and over the lifetime of the Plan, there is currently no provision or funding for such infrastructure outside the scope of DART+.

4. Provision of Public Transport Services in Rural Areas

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 inclusion of Objectives MOV20-26 in the Draft Development Plan, illustrate the importance placed on sustainable modes of transport within the County. 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 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

It is welcomed that the Draft Plan includes in Table 13.10 and Table 13.11 a hierarchy of location types in relation to the provision of appropriate car parking standards. It is suggested that Table 13.11 could clarify that these are maximum parking standards as opposed to requirements in order to give full flexibility to the particular location and circumstances of each proposed development.

8. Cycle Parking

The NTA welcome the detailed cycle parking standards as set out in Table 13.12. However, it is noted that the current requirement for cycle parking for residential apartment developments has been specified by 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)

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.

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. In this regard the NTA welcomes Objective Mov 5:

To support investment in sustainable transport infrastructure that will make walking, cycling or public transport more attractive and appealing, and facilitates accessibility for all, regardless of age, physical mobility, or social disadvantage.

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.

10. Development Plan Indicators – Mode Share

It is noted that the Daft Plan includes in Figure 7.1 baseline mode share figures which illustrate the current modes of travel at County level. 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 Louth County Council on the development and analysis of sustainable transport indicators, in conjunction with the OPR.

11. Specific Suggestions – Policies & Objectives

Louth has a strong urban influence in Drogheda and Dundalk and inter-dependencies with Dublin and Newry, while also having a large rural area with several towns and villages. 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.

Louth 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.

Conclusion

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

Yours sincerely,

Michael MacAree
Head of Strategic Planning