



Clare County  
Development Plan  
**2023-2029**

## **Draft Clare CDP 2023-2029 - Public Consultation Portal**

**Submitted By: Anonymous user**

**Submitted Time: March 25, 2022 10:59 AM**

### **Name**

David Clements

### **Address**

NTA Dun Sceine Harcourt Lane Dublin 2

### **Email Address**

david.clements@nationaltransport.ie

### **Please confirm your Email Address**

david.clements@nationaltransport.ie

### **Volume 1**

Core Strategy, Settlement Strategy and Housing, Economic Development & Enterprise, Retail, Towns & Villages, Design & Placemaking, Sustainable Communities, Transport, Service Infrastructure and Energy

### **Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps**

**Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps**

**Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps**

**Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps**

**Associated Documents**

None of the above

**Environmental Reports**

None of the above

**Your Submission**

**Location Map**



Earthstar Geographics | Esri, FAO, NOAA

Powered by [Esri](#)

## Upload Files

NTA Submission - Draft Clare County Development Plan 2022-28.pdf, 0.68MB

Development Plan Review,  
Planning Department,  
Clare County Council,  
New Road,  
Ennis,  
Co Clare,  
V95 DXP2

Harcourt Lane, Dublin 2

Dún Scéine, Baile Átha Cliath 2

tel: 01 879 8300

fax: 01 879 8333

email: [info@nationaltransport.ie](mailto:info@nationaltransport.ie)

web: [www.nationaltransport.ie](http://www.nationaltransport.ie)

25<sup>th</sup> March 2022

**Re: Draft Clare County Development Plan 2022-2028**

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft Clare County Development Plan 2022-2028 and based on the policies and objectives of the Draft Limerick Shannon Metropolitan Area Transport Strategy (LSMATS); the Regional Spatial and Economic Strategy (including the Metropolitan Area Strategic Plan) for the Southern Assembly; and on national policies and guidelines, submits the following comments for consideration.

**1 Limerick Shannon Area Metropolitan Strategy**

The LSMATS will be finalised in Q2 2022. It sets out the framework for the delivery of the transport infrastructure and services required to serve the LSMA in a sustainable manner with a focus on public transport, walking and cycling. While it applies to a relatively small geographical area of Clare, this area includes Shannon Town, Airport and Free Zone and provides for the sustainable development of Limerick City and Suburbs, upon which Clare is reliant for employment and services to an extent.

*Recommendation*

The role of the LSMATS in terms of providing a sustainable approach to transport in the LSMA; as a means of promoting and facilitating proper and sustainable land use development; and as a critical enabler of economic activity in South Clare, should be highlighted throughout the Development Plan where there is any reference to transport or land use planning within the LSMA as appropriate.

## **2 Urban and Rural Settlement Strategy**

### **2.1 Ennis**

The NTA notes Objective CDP 4.1 setting out the approach for the development of Ennis. While these objectives are supported, there is an absence of clear reference to objectives which would direct Ennis's growth in a sustainable manner from a transport point of view. Most notably, there is an absence of a commitment to consolidate the settlement of Ennis with a view to reducing the need to travel distances beyond the walking and cycling catchment. Furthermore, there is no reference to promoting walking, cycling and public transport.

#### *Recommendation*

The NTA recommends that a clear commitment is given in Objective CDP 4.1 to the following:

- Consolidation of the settlement of Ennis with a focus on development within the existing urban footprint; and
- To support development patterns and the delivery of transport infrastructure and services which will increase the use of public transport, walking and cycling.

### **2.2 Limerick-Shannon Metropolitan Area**

The NTA require that Objectives CDP 4.2 and 4.3 make reference to the Limerick Shannon Metropolitan Area Transport Strategy (LSMATS). The LSMATS, when completed in 2022, will provide the framework for the delivery of essential transport infrastructure and services for that part of Clare within the LSMA and will support sustainable development patterns as a key policy instrument for closer integration between land use planning and transport planning.

#### *Recommendation*

It is recommended that the following is added into Objective CDP 4.2:

- To cooperate with the NTA, TII and Limerick City and County Council in the delivery of the LSMATS.

### **2.3 Shannon**

The rationale for the inclusion of a section on the LSMA and a separate section for Shannon is not clear. Nonetheless, similar to the point raised above, the NTA is not satisfied with the manner in which Objective 4.4 makes no reference to the LSMATS, which will provide the framework for the delivery of essential transport infrastructure and services for Shannon and will support sustainable development patterns as a key policy instrument for closer integration between land use planning and transport planning.

### *Recommendation*

It is recommended that the following is added into Objective CDP 4.4:

- To cooperate with the NTA, TII and Limerick City and County Council in the delivery of the LSMATS.

## **2.4 University of Limerick – Clare Campus**

The potential development of the northern campus of UL has been assumed in the preparation of the LSMATS and it is noted that the Council intends to pursue a formal plan-led approach in this regard. While the NTA welcome such an approach being taken, the scale of the development envisaged at this location would justify a more prescriptive approach being set out in the Development Plan as recommended in our submission on the Issues Paper.

Furthermore, the NTA undertook a number of exercises to analyse the potential for rail to cater for travel demand in the LSMA. At no point in that analysis did a rail link to the northern campus of UL emerge as a viable proposal. Light rail is an urban form of mass transit most suitable for use in areas of high densities of population, employment and education. There is no provision in the RSES or the Draft Development Plan for such a land use pattern to emerge between the northern campus and the Limerick – Ennis rail line. As such, the objective under bullet point (f) is not consistent with the LSMATS and will not be pursued further by the NTA during the period of the Development Plan.

### *Recommendation*

The NTA recommends that Objective CDP 6.8 is amended in order that the following are provided for at the Development Plan level:

- The Planning Scheme to be developed is agreed between the landowners, Clare County Council, Limerick City and County Council, Transport Infrastructure Ireland (TII) and the NTA;
- The impact of the proposed development on the national and strategic road network is fully assessed, and any mitigation measures are agreed with TII and the NTA;
- The development and any proposed new road infrastructure will be designed in accordance with the requirements to meet Bus Connects
- Car parking will be provided at a rate below that provided for in the County Development Plan and provided on an area-wide basis rather than according to the requirements of individual developments;
- Cycle parking will be provided for in all residential developments at a rate which will cater for all future residents;
- Cycle parking will be provided in all non-residential developments to cater for at least 20% of all trips to be made by this mode;
- All non-residential developments will include end-of-trip cycling facilities for employees such as showers and lockers;

- All new roads would incorporate segregated cycle tracks designed in accordance with the National Cycle Manual;
- A full public transport strategy is agreed with the NTA and all requirements in terms of facilities, such as stops, layover, driver welfare, shelters etc. are accommodated;
- All new roads will seek, in the first instance, to provide for filtered permeability, in order to avoid creating additional capacity for car traffic and to prevent any through traffic; and
- The Planning Scheme, and all subsequent development proposals would include Mobility Management Plans, with clear targets and commitments to implementing measures to promote sustainable transport.

The NTA also recommends that bullet point (f) is removed from CDP 6.8.

### **3 Retail**

#### **3.1 Edge-of-Centre and Out-of-Centre Retailing**

Retailing is a significant generator of travel demand, in particular at the local level and during off-peak periods. As such, the management of this demand is critical in ensuring that urban areas can function in a sustainable manner. Furthermore, the promotion of public transport for retail trips contributes to the viability of services by providing additional passenger numbers throughout the day. Notwithstanding the fact that central retail locations offer the greatest potential for public transport, and walking and cycling, the NTA acknowledges that some edge-of-centre and out-of-town retail may occur in exceptional circumstances and for specific business requirements that cannot be met in central sites, i.e. retail warehousing. Such exceptional circumstances, however, should still allow for significant numbers of trips to be made by public transport, walking and cycling and Development Plan Objective CDP 7.17 would benefit from explicit reference to transport.

#### *Recommendation*

The NTA recommends that bullet point (c) of Objective 7.17 is amended by adding "... including the requirement to be served by public transport and to be accessible to their catchment by walking and cycling."

### **4 Sustainable Communities**

#### **4.1 Primary and Secondary Education**

The NTA welcomes the detail provided in CDP 10.16 in relation to the provision of schools and would draw the local authority's attention to the following planning principles contained in the Safe Routes to School Design Guide, published by the NTA in 2021:

- In the site selection process for new schools, sustainable transport shall be a critical consideration. New school sites in urban areas should not be progressed until it can be demonstrated that the majority of students and staff can travel to the school walking and cycling or by public transport.

- Development Plans, SDZ Planning Schemes and Local Area Plans should ensure that access by walking, cycling and public transport is a key determinant in the location of new schools.
- Planning for new schools and the expansion of existing schools should ensure that the detailed design is undertaken in a manner which maximises the priority for pedestrians and cyclists. Access, footpaths, car parking (if required) and cycle parking should all be arranged so as to eliminate, as far as practicable, interference and conflict between motorists and pedestrians and cyclists
- Planning applications for new schools or the expansion of existing schools should only be supported where it has been demonstrated that the road network in the vicinity of the proposed development facilitates, or is planned to facilitate, safe and convenient walking and cycling

### *Recommendation*

The NTA recommends that the Planning Principles for New and Expanded Schools, as set out in the Safe Routes to Schools Design Guide, are reviewed and considered for incorporation into Objective 10.16.

## **5 Physical Infrastructure, Environment and Energy**

### **5.1 Overall Approach**

Transport is a critical matter for the development of County Clare. It is a necessity in terms of economic growth; social integration; access to education and employment; and tourism. It also covers much more than simply infrastructure as it incorporates public transport service planning, traffic management and public realm considerations. As such, it is the view of the NTA that subsuming the area of transport into a chapter titled “Physical Infrastructure, Environment and Energy” does not fully provide the clarity and profile required for such important issues.

### *Recommendation*

The NTA recommends that a chapter dedicated to Transport is included in the final Development Plan.

### **5.2 Strategic Aims**

The NTA notes the strategic aims as set out under section 11.1. Together these comprise an acceptable response to the challenges that pertain to this aspect of planning for County Clare. The requirement to reduce emissions, however, is not explicitly referenced. As the fundamental driver of policy, the Climate Action Plan targets in terms of CO<sub>2</sub> emissions should be included in this section.

### *Recommendation*

The NTA recommends that an additional bullet point is inserted at the beginning of the list under 11.1 as follows:

- To facilitate a reduction in CO<sub>2</sub> emissions from transport in line with the Climate Action Plan.

### **5.3 Access and Movement**

The NTA is of the view that section 11.2 Access and Movement would benefit from a comprehensive review prior to its finalisation. There seems to be a disconnect between the section titles and the Development Plan objective names and text. For example, section 11.2.1 is titled “Integrated Land-Use and Transportation Planning” while the Objective is titled “Regional Spatial and Economic Strategy” and does not include any detailed policies which would further the goal of integrated land use and transport planning, such as those which were included in the Draft LSMATS.

Similarly, section 11.2.2 is titled “Smarter Travel and Sustainable Mobility”, and seems to be based wholly on the policy document from 2009. The NTA is of the view that this section should also make reference to the following:

- National Investment Framework for Transport Investment; and
- Five Cities Demand Management Study (insofar as it relates to that part of Clare within the LSMA).

Reference is also made to the review of Smarter Travel and this forthcoming policy document will also need to be reflected in the next stage of the Development Plan.

In addition to the above, the approach to setting out the Council’s policies in this section lacks clarity. Several issues are conflated or fall under several headings. For example, there is a section on Smarter Travel, the LSMATS, Active Travel Towns plus sections on Rail, Bus, Walking and Cycling with significant overlap and duplication.

Notwithstanding the above, the NTA makes the following recommendations on the policies and objectives as presented in the draft plan:

#### *Recommendations*

- The bullet points under Objective CDP 11.2 should be amended on the basis of the following:
  - (a) The overarching goal of transport planning in County Clare is to reduce car dependency and reduce emissions, and this should be highlighted here;
  - (c) Change “reduce congestion” to “manage the impact of congestion”;
  - (d) This is a matter for the NTA which is being pursued as part of our fleet investment programme. This should be referenced in the text;
  - (e) Consider changing to “facilitate the expansion of the bus network by the NTA under Limerick BusConnects, Connecting Ireland, Local Link” etc;
  - (f) Park and Ride will be implemented in line with the LSMATS;
  - (g) Cycling and walking investment will occur in all settlements, in particular for trips to school and retail. This should be reflected in the objective.

- Bullet point (d) under CDP 11.5 should be amended to remove reference to exceptional circumstances. Cycle routes, including greenways, should be developed in a comprehensive manner which links origins to destinations completely. If properties or development encroaches onto the corridor, alternatives should be provided. If alternatives cannot be found, the scheme should not be pursued in a piecemeal manner;
- Bullet point (e) under CDP 11.5 should be amended to remove reference to “cycle lanes in urban areas”. Cycle lanes should only be provided where fully-segregated facilities are not viable and where the traffic environment can be managed in order to make it safe for people of all ages and abilities to cycle. This wording should be replaced by reference to providing for cycling in line with the National Cycle Manual;
- CDP 11.6 (b) would benefit from the addition of “in line with feasibility studies undertaken on the basis of forecast demand and according to the investment priorities of Irish Rail and the National Transport Authority”;
- CDP 11.7 would benefit from reference to the work undertaken as part of the LSMATS;
- CDP 11.8 should make reference to BusConnects Limerick (insofar as it will serve South Clare) and Connecting Ireland.
- CDP 11.8 (c) should replace “bus corridors” with “bus priority measures”;
- Section 11.2.9.4 should include reference to roadspace reallocation as a prerequisite for investment in new strategic or regional roads, in particular bypasses and relief roads and text to cover this aspect should be included in CDP 11.15;
- The statements in section 11.2.9.5 related to residential access points not being permitted on the LNDR and Killaloe bypass should be incorporated into Objective 11.15;
- CDP 11.15 should state that the LNDR will be progressed in accordance with the LSMATS and National Development Plan;
- CDP 11.19 would benefit from explicit reference to bus as the primary sustainable mode for supporting the maintenance and development of Shannon Airport;
- CDP 18.3 may be better situated in a reconfigured Chapter 11, as it is a transport matter.

## **6 Appendices –Parking Standards**

The NTA makes the following observations and recommendations in relation to the parking standards:

- All car parking standards should be defined as maxima. Note 5, which states that residential standards are minimum is inconsistent with sustainable transport principles;

- 2 spaces per residential unit may be considered excessive for town centre developments. The local authority should be aiming to reduce car use in central sites in particular as residents are more likely to be within walking distance of local services and employment;
- There should be a preference for zero destination parking in commercial developments in town centres. Every new space will add to the level of private car traffic in the town centre and therefore should have clear justification;
- A number of uses listed for town centres should not be in town centres at all, e.g. Campsite, Manufacturing, Retail Warehousing etc. No parking standard should be included for these;
- The standard set out for Office uses in other areas would facilitate a car mode share of approximately 60%, based on one employee per 20m<sup>2</sup>. Similarly, for town centre offices, a mode share of up to 40% car would be facilitated. This would not represent a sustainable approach to development and these standards should be reviewed with a view to restricting the potential car mode share to less than 25% in town centres and no more than 50% elsewhere;
- The mode share implied by the bicycle parking standards does not facilitate desired mode shares – 12.5% for town centre office and retail workers and 10% for schools, for example. These are very unambitious standards and should be reviewed to provide for at least 20% cycle mode share for town centre uses;
- Note 11 which states schools must provide drop-off facilities for motorists is not in line with best practice. Drop-off facilities serve to promote unsustainable travel patterns. The Council's attention is drawn to the NTA's *Safe Routes to School Design Guide* which states the following:
  - Dedicated vehicle set-down areas for parents, create multiple issues for those walking and cycling. Set down areas are not encouraged in close proximity to schools, unless there is no safe alternative area for set down within a short walk e.g. 5mins. This means where cars can park safely, with a footpath link to the school. This includes public residential streets. Schools should promote Park'n'Stride as an alternative. It should be noted that Disabled Persons Parking Spaces and School Bus set down are exceptions and can be provided in close proximity while not impeding pedestrian or cyclist access.
- The NTA notes that the parking standards set out for 3<sup>rd</sup> level education would provide for more car spaces than bicycle spaces and would promote a car mode share for students of 20% compared to a bicycle mode share of just 10%. This is considered unambitious and of concern to the NTA given the extent of development envisaged for University of Limerick in the South Clare area. This should be reviewed and amended;

In general, the NTA is concerned with the tendency towards a traditional 'predict and provide' approach being applied by the Council in the derivation of the cycling and car parking standards and

recommends that this matter is revisited from first principles in order to reflect the need to reduce car dependency, car use and transport related emissions.

## **7 Concluding Remarks**

The NTA has engaged closely with Clare County Council through the making of the LSMATS and in various land use planning and transport planning matters in the County. The above observations and recommendations are intended to assist the Council in aligning the Development Plan more closely with the principles of land use and transport integration and the objectives to promote sustainable transport. I trust that the views of the NTA will be taken into consideration in the next stages of County Development Plan process, and we would be available to discuss issues arising from the comments made.

Yours sincerely,

A handwritten signature in black ink that reads "Michael Mac Aree". The signature is written in a cursive, flowing style.

---

**Michael Mac Aree**  
Head of Strategic Planning