

Administrative Officer,
CDP Review,
Planning Policy Unit,
Áras an Chontae,
Prospect Hill,
Galway.

10th September 2020

Re: Galway County Development Plan 2022-2028 – Issues Paper – Public Consultation

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the *Galway County Development Plan 2022-2028 Issues Paper* and submits the following comments for consideration.

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.

2. Integrated Land Use and Transport Planning in the Galway Metropolitan Area

The *Galway Metropolitan Area Strategic Plan (MASP)* provides the basis for the integration of land use and transport planning at Metropolitan Area level. The population of the Galway MASP is targeted to grow by 27,500 to 2026 and by a further 14,500 to 2031 within which the city and suburbs would account for 23,000 and 12,000 to 2026 and 2031 respectively. It is intended that at least half (50%) of all new homes that are targeted within the MASP would be provided within the

existing built-up footprint. This population growth will bring challenges for the provision of supporting infrastructure and services, with the integration of land use and transport planning performing a critical role in enabling the requirements of an expanded Metropolitan Area to be met in a sustainable manner.

The MASP states that *within the Metropolitan Area, the promotion of integration of land use and transportation is reflected across all plans and strategies, including in particular the Galway Transport Strategy (GTS) which is a joint Galway City Council and County Council 20 year strategy prepared in partnership with the National Transport Authority.*

3. Galway Transport Strategy (GTS)

It is critical that the integration of land use and transport planning and the objectives contained in the Galway Transport Strategy (GTS) are provided for in the Galway County Development Plan. The Development Plan should identify how it is intended to deliver and build upon the work of the GTS.

The aim of the GTS is to provide for a reduction in car-based congestion and car dependency through a corresponding increase in the availability and viability of alternative modes of transport, including walking, cycling and public transport. This, in turn, can reduce transport-related greenhouse gas emissions. The strategy includes traffic management, giving priority to walking, cycling and bus movements, modifications to the traffic network, management of parking activities and heavy goods vehicles, improvements to the public realm and use of 'smarter mobility'.

In regards to the GTS' objectives, the Development Plan should address how it intends to promote and provide for a reduction in car dependency.

4. Movement at Inter-Settlement level

It is recommended that an assessment of inter-settlement travel patterns across the county (including the Galway MASP area) and to key settlements in neighbouring counties is undertaken, in order to better understand travel patterns and associated transport infrastructure and services requirements. Of particular importance in this process will be the examination of commuting patterns to Galway City and the key towns of Ballinasloe and Tuam. This profiling can be used to better understand the relationship between current land use patterns and associated travel patterns. In doing so, it can also usefully inform both the formulation of land use policies which can affect more sustainable travel pattern outcomes, as well as the transport infrastructure and services need to meet future inter settlement travel demand.

5. Movement at Settlement Level – Local Transport Plans (LTP)

The NTA recommends that Local Transport Plans are prepared for the higher order settlements of Ballinasloe and Tuam in order to guide the future growth of these towns. It is recommended that this process is informed by the NTA/TII document *Area Based Transport Assessment*.

<https://www.nationaltransport.ie/strategic-planning/guidance-documents/>

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.

6. Planning for Bus Service Provision

Galway County is currently served by an extensive network of bus services, connecting rural areas, linking settlements and connecting with major destinations in Galway City. The Development Plan should recognise the importance of these services to the community and facilitate their improvement through supportive land use policies and design standards as referred to under the 'Guiding Principles' in Section 1, above.

The GTS' proposed bus network includes routes linking the city to Bearna and Oranmore in the County area. The Galway City Centre Traffic Management Plan is intended to deliver on the necessary infrastructural requirements to provide for the implementation of the associated bus services.

Consistent with the GTS and Galway MASP, the Development Plan should recognise the opportunities presented by investment currently being committed to the improvement of bus infrastructure and services for the appropriate consolidation of future development in areas which support the use of public transport.

7. Provision of Public Transport Services in Rural Areas

This is a matter of particular importance for Galway 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.

8. 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.

9. Parking Standards

Car Parking

As stated above under Section 1, the NTA recommends that car parking provision for non-residential land uses should be stated as maximum standards rather than minimum requirements. In addition, in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.

Cycle Parking

Cycle parking at trip origins and destinations is a key factor in determining mode choice, and should be appropriately designed into the urban realm and new developments to ensure that adequate facilities are provided.

The Development Plan should therefore include specific policies on cycle parking in the urban realm and in private developments. In this regard, the NTA recommends the *Standards for Cycle Parking and Associated Cycling Facilities for New Developments* document issued by Dun Laoghaire-Rathdown County Council in 2018, which includes comprehensive guidance on the design of cycle parking.

(http://www.dlrcoco.ie/sites/default/files/atoms/files/dlr_cycle_parking_standards.pdf).

10. 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 *Northern & Western Regional Spatial & Economic Strategy* includes as a key transportation requirement of the Galway MASP that there should be:

Provision of measures to reduce traffic volumes in the city centre core, additional pedestrianisation and pedestrian priority, improvement of pedestrian facilities, in particular safe crossings, improvements to the public realm and use of universal design.

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. 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.

11. National Transport Authority Guidance Documents

The NTA recommends that the preparation of the Development Plan is informed by the following NTA guidance, available on the NTA web site:

- The National Cycle Manual;
- Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers;
- Toolkit for School Travel; and
- Guidance Note on Area Based Transport Assessment (NTA and TII).

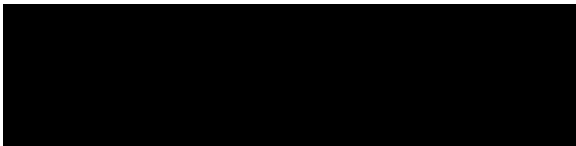
12. Development Plan Indicators – Mode Share

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 Galway County Council on the development and analysis of sustainable transport indicators, in conjunction with the OPR.

Conclusion

I trust that the views of the NTA will be taken into consideration in the preparation of the Draft County Development Plan, and we would be available to discuss issues arising from the comments made.

Yours sincerely,



Michael MacAree

Head of Strategic Planning