

Planning Department,
Leitrim County Council,
Áras an Chonate,
St. George's Terrace,
Carrick-on-Shannon,
Co. Leitrim,
N41 PF6

26th April 2022

Re: Leitrim Development Plan 2023-2029 – Draft – Public Consultation

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft *Leitrim Development Plan 2023-2029* and submits the following comments for consideration.

1. Transport Policies

The NTA welcomes the strategic aim of the Plan in relation to transport which supports increased use of sustainable modes of transport.

“to support increased use of sustainable modes of transport; the integration of spatial planning more closely with transport planning to reduce the need for travel; enhancing existing strategic transportation infrastructure in the county and regional accessibility; transitioning towards a low carbon energy efficient transport system, and; the development of a safer, more efficient, effective and connected transport system within Co. Leitrim”.

In relation to national transport policy, the new *National Sustainable Mobility Policy*, which builds on and replaces existing active travel and public transport policy as set out in *Smarter Travel: A Sustainable Transport Future* and the *National Cycle Policy Framework*, sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade. The Policy sets out to deliver at least 500,000 additional daily active travel and public transport journeys and a 10% reduction in kilometres driven by fossil fuelled cars by 2030.

The National Investment Framework for Transport in Ireland (NIFTI) is the strategic framework for future investment decision making in land transport. It will guide transport investment in the years ahead to enable the National Planning Framework, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland. NIFTI sets out the modal hierarchy in Ireland as; 1. Active Travel; 2. Public Transport; 3. Private Vehicles. It also outlines an intervention hierarchy which is: 1. Maintain; 2. Optimise; 3. Improve; 4. New.

Taking into account the above policy documents it is suggested that the emphasis placed on certain policies could be improved to align more with National Sustainable Mobility Policy and NIFTI. In relation to ILU POL 3 it is suggested that the emphasis should not be on reducing congestion and minimising travel times for their own sake as it is likely that this is referring to car congestion. As per the NIFTI, the emphasis will be on maintaining assets rather than creating new road capacity. Therefore the focus must shift to providing alternative modes of transport and thereby maintaining road capacity for those who still require to use private vehicles as their mode choice.

Recommendation: Amend IL POL 3 as below.

*ILU POL 3 To support the **maintenance and optimisation**~~enhancement~~ of the county's existing transport infrastructure to ensure its optimal use in line with **NIFTI's modal hierarchy** and seek to undertake appropriate traffic management measures to prioritise road users in line with the modal hierarchy. ~~reduce congestion and minimise travel times.~~*

It is suggested that ILU POL 4 should be amended to reflect the vital role that bus transport plays and will continue to play in providing connections in rural areas and between settlements and large urban areas. As per the Connecting Ireland plan, bus services across the County will be augmented as funding allows.

Recommendation: Amend ILU POL 4 as below.

*ILU POL 4 To strengthen inter-regional connectivity, through the improvement of inter-urban road, **bus** 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.*

It is suggested that ILU POL 5 is amended to clarify that efficiency should be sought in relation to sustainable transport modes rather than conferring advantage to private vehicles. The advantages of societal returns and the requirement to reduce carbon emissions should also be considered.

Recommendation: Amend ILU POL 5 as below.

*ILU POL 5 To promote **the integration of sustainable land use planning and transport planning** measures which facilitate **sustainable transportation options** ~~efficiency~~, economic, societal and climate returns on transport investment and minimisation of environmental impacts.*

The NTA wish to acknowledge Policies MSSM POL1 – POL5 and Objectives MSSM OBJ1 and 2 which seek to promote sustainable mobility.

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

The NTA welcomes the commitment to prepare a Local Transport Plan for Carrick-on-Shannon/Cortober in conjunction with Roscommon County Council, following the methodology contained in the NTA/TII document ‘Area Based Transport Assessment’. The NTA looks forward to working with the County Councils and TII in the preparation of the Plan.

MSSM OBJ 1 To prepare a Local Transport Plan in collaboration with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII), Roscommon County Council and other relevant stakeholders for the Key Town of Carrick-on-Shannon and establish specific modal share targets for the town to be incorporated into the forthcoming Carrick-on-Shannon Local Area Plan.

TRAN OBJ 13 To co-operate with Roscommon County Council and other relevant stakeholders to prepare a Local Transport Plan for Carrick-on-Shannon/Cortober ensuring that this process is guided by the NTA/TII document ‘Area Based Transport Assessment’ to the extent required for a combined urban centre of this scale.

3. Planning for Bus Service Provision

The NTA welcomes Policies PT POL 1 – 8 and Objectives PT OBJ 1 – 4 in relation to public transport provision. Leitrim County Council could further 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.

Recommendation: It is suggested that the following types of policies and objectives could be added which would encourage; the improvement of access to bus stops (permeability to stops, safe crossing locations and footpaths); and improvement of the infrastructure at bus stops.

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

4. Walking and Cycling

The NTA welcomes Policies WC POL 1 – 5 and Objectives WC OBJ 1 – 5 in relation to walking and welcomes Policies BG POL 1 – 5 and Objectives 1 – 12. It is suggested that the Plan should seek to ensure that new development areas are fully permeable for walking and cycling (filtered permeability) and that it is an objective that 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.

Recommendation: It is recommended that the Plan should include policies and objectives which seek to require filtered permeability as part of any new developments and that retrospective options for the provision of filtered permeability in existing neighbourhoods should be pursued.

In relation to the objectives for cycling, it is suggested that an additional objective could be added which is focused on the delivery of cycling infrastructure as an everyday mode choice, rather than focused on tourism or leisure. This is particularly important in the environs of schools in order to encourage active travel habits at an early age.

Recommendation: It is suggested that an additional objective such as below, could be included in relation to the provision of cycling infrastructure in towns to encourage cycling as an everyday mode choice, rather than just as a leisure or tourism pursuit.

To work with the Active Travel Initiative of the National Transport Authority to deliver a network of cycle routes in towns in order to encourage cycling as an everyday mode choice, in particular to provide cycling infrastructure near schools.

5. Parking Standards

In relation to car parking the NTA welcomes Policies CP POL 1 – 5 and Objectives CP OBJ 1 – 2 and in relation to bicycle parking, Policies BP POL 1 – 4. It is suggested that the wording of BP POL 1 could be amended in order to ensure that any new developments, not just those directly in the centre of towns, should include bicycle parking.

Recommendation: It is recommended that the wording of BP POL 1 is amended as below.

*BP POL 1 To ensure the provision of appropriate secure, safe, convenient and accessible bicycle parking facilities as part of any new developments in **towns and villages** centre*

locations to encourage modal shift away from private cars to more sustainable modes of transport.

It is also suggested that an additional policy could be included regarding long-stay bicycle parking. This refers to bicycle parking which is associated with employment or educational uses where bicycles may be parked for several hours, rather than a short-stay trip to a shop for example.

Recommendation: Provide an additional objective in relation to long-stay bicycle parking.

To ensure the provision of appropriate secure, safe, covered, lit, convenient and accessible long-stay bicycle parking facilities as part of any new developments such as places of employment or schools to encourage modal shift away from private cars to more sustainable modes of transport.

With regard to bicycle parking standards the NTA welcomes the requirement to provide shower, changing facilities and lockers in places of employment.

6. Development Plan Indicators – Mode Share

The NTA welcomes the significant level of discourse with regard to mode share and the inclusion of the data provided by the NTA. The Plan includes data on mode share for Carrick-on-Shannon, as well as mode share for the County and trip distribution patterns for the County. It is stated that Co. Leitrim has one of the highest rates of car dependence in the Country with 69.1% of commuters travelling to work by car or as a passenger in a car. The NTA welcomes that *'it is therefore the ambition of the Council through this Plan to improve this travel pattern as a means of positively impacting on people's quality of life and on the receiving environment by reducing the need for travel and seeking to change the travel patterns for shorter trips within urban settlements to non-motorized forms of transport (cycling and walking) to the maximum extent practicable in a rural county such as Co. Leitrim'*.

The NTA welcomes objective MSSM OBJ 2 and looks forward to working with the Council on the Local Transport Plan for Carrick-on-Shannon/Cortober and further analysing the trip distribution patterns and mode share for the town.

Conclusion

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

Yours sincerely,



Michael Mac Aree

Head of Strategic Planning