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RE: Draft Kenmare Municipal District Local Area Plan 2023-2029

Dear Mr Ginty,

The National Transport Authority (NTA) has reviewed the Draft Kenmare Municipal District Local Area Plan 2023-2029 and makes the following observations and recommendations.

Introductory Comments

Guiding Principles

The NTA recommends that the preparation of the Local Area Plan (LAP) should be guided by, and should include, land use policies and objectives that support the consolidation of urban-generated development within existing urban areas, in complement with the integration of land use and transport planning, as follows:

- Development in the Kenmare MD area should be informed by the “Avoid-Shift-Improve” principle; the “Decide and Provide” approach to the planning and design of transport networks; and the general objectives of the 10-minute town concept;
- In accordance with the *National Planning Framework* (NPF) and the *Regional Spatial and Economic Strategy* (RSES), development patterns which seek to consolidate development should be supported and prioritised as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services;
- The location of development should be guided by the ‘sequential approach’ whereby development is located within the town core in the first instance and on lands where the resulting travel demand can be met by walking, cycling and public transport;
- Major new ‘out-of-town’ retail developments should not be supported;
- Trip intensive development, such as large-scale office developments, should not be supported at more peripheral and / or less accessible locations;
- Land use policies which seek to provide for an appropriate mix of uses at the district and neighbourhood level should be supported;

- The LAP should ensure that the road and street networks in new development areas are designed on the basis of providing for filtered permeability, and should incorporate measures which deliver filtered permeability in existing neighbourhoods;
- The LAP should ensure that access by walking, cycling and public transport is a key determinant in the location of local services such as schools, retail and leisure facilities;
- Planning for local services should ensure that the detailed design is undertaken in a manner that maximises the priority for pedestrians and cyclists. Access, footpaths, cycle parking and car parking (if required) should all be arranged so as to eliminate, as far as practicable, interference and conflict between pedestrians, cyclists and motorists;
- Where car parking is provided, it should be located and designed in a manner that reduces the potential for safety hazards and to reduce the visual dominance of cars within the environment and on the streetscape around local service centres;
- Set down or drop-off areas are not encouraged in close proximity to schools, unless there is no safe alternative area, including on the public road, within a short walk where cars can park safely and with a footpath link to the school; and
- 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 access to the school.

National Policy Context

Related to the above Guiding Principles, the LAP's objectives should demonstrate consistency with and support for the achievement of the following national policies.

Road User Hierarchy

The *National Sustainable Mobility Policy* (NSMP) 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 NSMP 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 NPF, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland. NIFTI sets out the road user modal hierarchy in Ireland as: *1. Active Travel (Walking & Cycling); 2. Public Transport; 3. Private Vehicles*. It also outlines an intervention hierarchy, which is: 1. Maintain; 2. Optimise; 3. Improve; 4. New.

The LAP should align with these national policy documents and should seek the reallocation of road space in appropriate locations in accordance with the road user hierarchy, in order to prioritise walking, cycling and public transport use and prioritise the place-making functions of the urban street network.

Climate Action Plan

Under the Climate Action and Low Carbon Development (Amendment) Act 2021, emissions must reduce by 51% by 2030, setting a path towards a zero net-emissions scenario by 2050. The transport sector is committed to meeting those targets in full. For transport, there are three main actions required that should inform the policies, objectives and measures of the LAP, namely:

- Reducing the demand for travel;

- Increasing use of public transport, walking and cycling and a reduction in trips by car;
- Conversion of the transport fleet to zero emissions vehicles.

Comments on Draft LAP

Statistical Profiling of MD Area and Settlements (Sections 2 and 3) based on Census Data

It is noted that key statistics relating to both the MD area as a whole and individual settlements are provided. As a number of Census reports have been published subsequent to the publication of the Draft LAP, with one further report to be published in early December (Employment, Occupations and Commuting), it is recommended that all relevant statistics are provided for the years 2016 and 2022 in the finalised LAP.

Section 2.11 Connectivity Objectives, Section 3 Connectivity, Transport & Movement Objectives

The following recommendations should be taken as applicable to Section 2.11 and the relevant settlement level objectives presented in Section 3 of the Draft LAP, in particular those related to *Connectivity* and *Transport & Movement*.

Local Transport Plans

The NTA supports the integration of land use and transport planning at settlement level, noting the Draft LAPs inclusion of **Objective KENMD-58** in particular, which provides for the preparation of *local transport and traffic management plans*, as appropriate.

In this regard, the NTA would refer to the ABTA guidance as prepared by the NTA and TII as the basis for the preparation of local transport plans. Whilst the full ABTA approach as presented in the Pilot Methodology documents may not be as applicable for settlement sizes of the order of those within the Kenmare MD, as it would for larger settlements such as Tralee or Killarney, the principles underpinning the ABTA approach should still be applied.

The purpose of preparing a local transport plan is to ensure that the assessment of transport demand and its associated impact plays a central role in informing future development proposals, to support a shift to sustainable modes based on the road user hierarchy and to set a framework for investment in transport infrastructure within the town to support this.

It is intended that a local transport plan 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.

Whilst it is preferable that such local transport plans are prepared in tandem with the local area plan, with reference to the three 'Regional Towns' in particular, any subsequent completion of such plans

should nonetheless serve to inform how, when and if (particularly in relation to new road infrastructure proposals) the settlement level Connectivity and Transport & Movement objectives and proposed improvement works specified in Section 3 of the LAP are implemented, taking into the consideration the guiding principles and national policy objectives outlined above.

More generally, the local transport plan process should inform the manner in which future development occurs on the zoned lands specified in the Draft LAP, in terms of scale, sequencing, density, accessibility and layout.

Finally, the preparation of settlement level local transport plans or traffic management plans should be undertaken in coordination with the relevant NTA transport programmes, including Connecting Ireland and CycleConnects.

Provision of Public Transport Services in Rural Areas and Inter Settlement Connectivity

In complement with RSES RPOs 29 and 172, it is recommended that the Draft LAPs Connectivity Objectives includes specific reference to the improvement of inter-settlement connectivity by public transport, by facilitating the implementation of the Connecting Ireland and Local Link Rural Transport programmes within the MD area, by facilitating the operation of public transport services between and within settlements and maximising walking accessibility to services through development consolidation within settlements and the enhancement of local connectivity.

The *Connecting Ireland: Rural Mobility Plan* is a major national public transport initiative that will increase connectivity, particularly for people living outside the major cities. The plan aims to improve mobility in rural areas. It will provide better connections between villages and towns by linking these with an enhanced regional network, connecting cities and regional centres nationwide. Connecting Ireland will seek to improve the current transport network by:

- Enhancing existing services;
- Adding new services and;
- Enhancing the current Demand Responsive Transport (DRT) network.

The NTA continues to provide rural transport services through the *Local Link Rural Transport Programme*. The key priorities of the Local Link Rural Transport 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.

Mode Share Targets

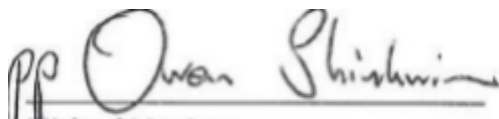
It is noted that mode share targets are specified under Section 2.11.1.1 for the MD area as a whole for the period up to 2040, stating that they are 'ambitious but realistic and will be further strengthened and informed by the upcoming preparation of LTPs'. Whilst supportive in principle of targets which

seek to increase sustainable transport mode shares, it is not clear how these targets were derived or how they will be further strengthened and informed by the preparation of LTPs.

For movement at intra and inter-settlement levels within the MD area and in its wider context, there is an opportunity to explore the commuting patterns, through the interrogation of Census 2022 data (see comments above under Statistical Profiling). Commuting 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 establishment mode share targets and associated with this, the formulation of land use policies that can bring about more sustainable travel pattern outcomes, as well as the identification of the transport infrastructure and services needed to meet future travel demand.

The NTA requests that the foregoing recommendations are taken into consideration by the Council prior to the adoption of the Local Area Plan.

Yours sincerely,



Michael MacAree
Head of Strategic Planning