

Carlow County Council, Senior Executive Officer, County Buildings, Athy Road, Carlow, Co. Carlow.
Laois County Council, Senior Planner, Áras an Chontae, JFL Avenue, Portlaoise, Co. Laois.

Online submission <https://consult.carlow.ie/>

Dáta | Date 12 June 2024

Ár dTag | Our Ref. TII24-127308

Re: Material Alterations to Draft Carlow-Graiguecullen Joint Urban Local Area Plan.

Dear Senior Officers,

Transport Infrastructure Ireland (TII) acknowledges receipt of notice of proposed material alterations to the Draft Joint Urban Local Area Plan for Carlow-Graiguecullen (JULAP) by Carlow and Laois County Councils.

As at the submission made to the Draft JULAP in February 2024 (TII23-125520), TII continues to advise that significant improvements to and maintenance of the national road network have been overseen by County Councils as road and planning authorities for their respective areas, in collaboration with TII. Therefore, there is an onus and a policy requirement on road and planning authorities to safeguard the capacity, safety, and efficiency of the national road network.

The TII submission to the Draft JULAP in February 2024 under TII ref. TII23-125520 made recommendations and recorded TII submission to the Pre-Draft stage of the JULAP in September 2022 under TII ref. TII22-120213 and further acknowledged invited stakeholder engagement on the draft ABTA and Local Transport Plan (LTP) during 2023 under TII ref. TII23-122444.

TII has reviewed the advertised material alterations contained within the *Proposed Material Alterations to the Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030* and *Proposed Material Alterations to Appendix* consisting of the *Local Transport Plan and Infrastructure Assessment*. TII has also had regard to the *Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030, Material Alterations to Draft Joint Urban Local Area Plan – Consultation Stage, May 2024 (Vol. 1)* single report that assigned TII submission of February 2024, ref. CLW-C79-35.

The following TII submission seeks to address the safety, capacity, and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in Project Ireland 2040, the Section 28 Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), and the EMRA *Regional Spatial and Economic Strategy* (RSES).

Taking account of the above, TII makes the following observations on proposed material alterations in the order of their appearance in the Draft Plan:

1.0 Proposed Material Alteration – Amendment Nos. 10 and 11

TII observes proposed material alteration no. 10 is recorded at Chapter 6 Sustainable Travel and Transportation under Section 6.1 Integrated Land Use and Transport Planning as follows:

“Amendment No. 10 Amend ‘Integrated Land Use and Transport Planning – Overarching Policy’ (page 98):-deleted text in red, new text in green.

LT. P2: Ensure the design of all streets and roads in the joint urban area complies with the principles, approaches and standards **as appropriate** in the Design Manual for Urban Road and Streets (DMURS ~~2013~~ **Updated 2019 and Supplementary Interim Advice Note Published in 2020**) and **TII Publications**, and any subsequent updates to this Design Manual.”

TII observes proposed material alteration no. 11 is recorded at Chapter 6 Sustainable Travel and Transportation under Section 6.1 Integrated Land Use and Transport Planning as follows:

“Amendment no. 11 Amend ‘Integrated Land Use and Transport Planning – Overarching Policy’ (page 98):-new text in green.

LT. P2: “Ensure the design of all streets and roads in the joint urban area complies with the principles, approaches and standards **as appropriate** in the Design Manual for Urban Roads and Streets (DMURS 2013-2019) **and TII Publications**, and any subsequent updates to this Design Manual.”

- **TII Recommendation Material Alteration Nos. 10 and 11**

The Authority welcomes the inclusion of the above requirement in the interests of the maintenance of the safe and efficient operation of the national road network in accordance with relevant standards. TII recommend that either or both proposed material alterations nos. 10 and 11 be made. They appear to be repeats of the same policy.

2.0 Proposed Material Alteration – Amendment Nos. 12 and 13

TII observes proposed material alteration no. 12 is recorded at Chapter 6 Sustainable Travel and Transportation under Section 6.1 Local Transport Plan as follows:

“Amendment No. 12 Amend Local Transport Plan (LTP) – Overarching Policy LTP. P1 (page 100): new text in green.

LTP. P1: Progress the delivery of the appropriate measures and interventions **within the JULAP area** as outlined in the Carlow – Graiguecullen Local Transport Plan (LTP) on a phased basis and subject to the availability of funding **having regard to the LTP land use transportation and guidance and in consultation with the NTA and TII as appropriate**, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.”

TII observes proposed material alteration no. 13 is recorded at Chapter 6 Sustainable Travel and Transportation under Section 6.1 Local Transport Plan as follows:

“Amendment No. 13 Amend Local Transport Plan (LTP) – Overarching Policy LTP. P1 (page 100): new text in green as follows:

LTP. P1: “Progress the delivery of the appropriate measures and interventions as outlined in the Carlow-Graiguecullen Local Transport Plan (LTP) on a phased basis and subject to the availability of funding **having regard to the LTP land use transportation and guidance and in consultation with the NTA and TII as appropriate**, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.”

- **TII Recommendation Material Alteration Nos. 12 and 13**

The Authority welcomes the inclusion of the above requirement in the interests of the maintenance of the safe and efficient operation of the national road network. TII recommend that either or both proposed material alterations nos. 12 and 13 be made. They appear to be repeats of the same policy.

3.0 Proposed Material Alterations to Land Use Zoning Objectives at and in the vicinity of the N80 – Amendment No. 61 and Amendment No. 62

TII have identified two proposed material alterations “Amendment No. 61 and No. 62” to proposed land use zoning objectives on the N80 that have the potential to significantly negatively impact the strategic transport function and safety for road users of the N80.

The *Spatial Planning and National Roads Guidelines for Planning Authorities*, specifically sections 2.4 and 2.7 require that planning authorities must exercise particular care in their assessment relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. They must make sure that such development is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

TII notes that no evidence based has been provided for the inclusion of these lands in the material amendments nor has the Local Transport Plan addressed development at this location. TII therefore are concerned with respect the proposed extension of the JULAP boundary and inclusion of lands as “Strategic Reserve” on both sides of the northern arm of the Sleaty Roundabout on the N80.

3.1 Proposed Material Alteration – Amendment No. 61

TII observes proposed material alteration no. 61 is proposed as an amendment to Landuse Zoning Map 12.1 “to zone 0.15ha to the north of the N80 as Strategic Reserve and extend the development boundary”.

The lands the subject of the proposed material alteration occupy a quadrant of the N80 roundabout with the local Sleaty Road and are located within the Laois County Council functional area.

TII notes that no evidence based has been provided for the inclusion of these lands in the material amendments nor has the Local Transport Plan addressed development at this location. TII therefore are concerned with respect the proposed extension of the JULAP boundary and inclusion of lands as “Strategic Reserve” on the northern arm of the Sleaty Roundabout on the N80.

3.2 Proposed Material Alteration – Amendment No. 62

TII observes proposed material alteration no. 61 is proposed as an amendment to Landuse Zoning Map 12.5 “to zone 1.32ha to the north of the N80 as Strategic Reserve and extend the development boundary”.

The lands the subject of the proposed material alteration occupy a quadrant of the N80 roundabout with the local Sleaty Road and are located within the Laois County Council functional area.

TII notes that no evidence based has been provided for the inclusion of these lands in the material amendments nor has the Local Transport Plan addressed development at this location. TII therefore are concerned with respect the proposed extension of the JULAP boundary and inclusion of lands as “Strategic Reserve” on the northern arm of the Sleaty Roundabout on the N80.

3.3 TII Recommendation for Proposed Material Alterations – Amendment No. 62 and No. 63

TII would highlight that the proposed amendments relate to areas on a national road junction and outside of the current and Draft JULAP boundary that is currently denoted by the N80.

TII strongly consider that inclusion of lands for future development as part of the Draft JULAP outside of its current and draft boundary is at variance with national, regional, and local policy related to national roads including in particular:

- Official policy in relation to development involving access to national roads and development along such roads is set out in the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities*

(January 2012). Section 2.7 of the DoECLG Guidelines concerns development at National Road Interchanges or Junctions. The proposed material alteration land use zonings if included, would create an adverse impact on the national road and associated junction and would, in the Authority's opinion, be at variance with the foregoing national policy. TII would highlight that no evidence based has been provided for the inclusion of these lands in the material amendments in accordance with Section 2.7 of the DoECLG Guidelines nor has the Local Transport Plan addressed development requirements at this location.

- EMRA *Regional Spatial and Economic Strategy (RSES) Regional Policy Objective (RPO) 8.1*. promoting integration of land use and transportation planning includes the Integrated Land Use and Transportation Guiding Principle set out at section 5.6; *“The strategic transport function of national roads and associated junctions should be maintained and protected.”*
- EMRA *Regional Spatial and Economic Strategy (RSES) RPO 8.2* that promotes the management and enhancement of strategic land transport networks, including by travel demand management.
- EMRA *Regional Spatial and Economic Strategy (RSES) RPO 8.3* that requires future development is to be planned and designed in a manner that *inter alia* maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned and further protects and maintains regional accessibility.
- *Laois County Development Plan 2021 – 2027, Transportation Policy Objectives:*
 - *“TRANS 1 Maintain, improve and protect the safety, capacity and efficiency of Laois’s roads network and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG, (2012) and the Trans-European Networks (TEN-T) Regulations.”*
 - *“TRANS 4 Prevent inappropriate development on lands adjacent to the existing road network, including the intensification of the use which would adversely affect the safety, current and future capacity and function of national roads and having regard to possible future upgrades of the national roads and junctions.”*
 - *“TRANS 11 Integrate land use policies and transportation in a manner which reduces reliance on car-based travel and promotes more sustainable transport choice and co-ordinates particular land uses with their accessibility requirements.”*
 - *“TRANS 13 Encourage transition towards sustainable and low carbon transport modes, through the promotion of alternative modes of transport, and ‘walkable communities’ together with promotion of compact urban forms close to public transport corridors to encourage more sustainable patterns of movement.”*
- *Carlow County Development Plan 2022 – 2028:*
 - *Integration of Land Use and Transportation – Policy “LT. P1: To actively support sustainable modes of transport through appropriate land use zonings and to encourage levels of development with mixed uses within walking distance of public transport nodes on well-located accessible sites in town and village centres throughout the County.”*
 - *Modal Shift – Policy “MS. P1: Seek investment in sustainable transport solutions, improved walking and cycling connectivity routes, the provision of a public bus service in Carlow Town and the expansion of rural transport initiatives throughout the county.”*
 - *National Road Network – Policies including “NR. P1 Co-operate with Transport Infrastructure Ireland to maintain and develop the national road network (N80 and N81) through the county and to seek to ensure that the capacity, efficiency and safety of the network and associated junctions is maintained in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities DECLG (2012).”*
- The expansion of the JULAP boundary proposed by way of material alteration nos. 61 and 62 has not been considered in the Local Transport Plan (LTP). The preparation of the Joint LTP accompanying the Draft JULAP is required at the *Overarching Core Strategy Policy Objectives* at “CS09” and as one of the potential

LTPs for Laois at *Transportation Policy Objective “TRANS 14”* of the *Laois County Development Plan 2021 – 2027* and at *Modal Shift Objective “MS. O2/2* of the *Carlow County Development Plan 2022 – 2028*.

- In addition, no evidence based has been provided for the inclusion of these lands in the material amendments associated with Section 2.7 of the DoECLG Guidelines nor has the Local Transport Plan addressed development at this location. TII would highlight that the Draft JULAP does not include any additional information setting out a needs assessment that has regard to the Core Strategy and above matters for the JULAP boundary extension and additional development land.

Therefore, TII are of the strong opinion that proposed material alteration nos. 61 and 62 should be omitted as it will negatively impact the functionality and safety of the N80 contrary to the maintenance of a safe and efficient national road network required under national, regional, and local planning policy.

- **TII Recommendation Material Alteration No. 61 and 62**

TII recommend that proposed material alteration nos. 61 and 62 be omitted. The proposed boundary expansion and additional development zoning, if included, would create an adverse impact on capacity, efficiency, and safety of the N80 national road and associated roundabout junction and would, in the Authority's opinion, be at variance with the foregoing national, regional and local planning policy.

4.0 Summary and Conclusion

The Authority's position remains as set out in TII's submission on the Draft Joint Urban Local Area Plan of February 2024.

In relation to the Proposed Material Alterations on display, TII respectfully requests that the foregoing observations are taken into consideration by the Councils prior to finalising the Plan. TII has identified proposed material alterations which, in TII's opinion, require to be addressed prior to adoption in the interests of clarity and to ensure that the Plan provisions advance efficient and proper planning and sustainable development including the maintenance of the safety and efficiency of the N80, part of the national road network in accordance with the provisions of *Spatial Planning and National Roads Guidelines for Planning Authorities, Project Ireland 2040*, and the RSES.

This submission advocates 4 no. recommendations in respect of 6 no. material alterations summarised as follows:

- That proposed material alteration no. 10 and no. 11 (Integrated Land Use and Transport Planning – Overarching Policy LT. P2) be made.
- That proposed material alteration no. 12 and no. 13 (Local Transport Plan (LTP) – Overarching Policy LTP. P1) be made.
- That proposed material alteration no. 61 (proposed JULAP boundary extension and “Strategic Reserve” on currently unzoned lands) at the N80 Sleaty Roundabout be omitted.
- That proposed material alteration no. 62 (proposed JULAP boundary extension and “Strategic Reserve” on currently unzoned lands) at the N80 Sleaty Roundabout be omitted.

Having regard to the contents of this submission, TII emphasises its availability to meet the executives of the County Council alongside the NTA to discuss any issues arising in the foregoing.

Please acknowledge receipt of this submission.

Yours sincerely,



Cliona Ryan

Land Use Planner