

Senior Executive Officer,
County Buildings,
Athy Road,
Carlow,
Co. Carlow.

Senior Planner,
Áras on Chontae,
JFL Avenue,
Portlaoise,
Co. Laois.

12th June 2024

Re: Proposed Material Alterations to the Draft Carlow-Graigecullen Joint Urban Local Area Plan 2024-2030

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Proposed Material Alterations to the Draft Carlow Graigecullen Joint Urban Local Area Plan 2024-2030* ('Draft JULAP'), based on its role as the body responsible for public transport planning and the management of investment programmes for active travel, and submits the following observations and recommendations for the Councils' consideration.

NTA Recommendations on Draft JULAP

The NTA welcomes the Proposed Amendments arising from its submission on the Draft JULAP and is supportive of the revisions to the JULAP that would result from their adoption. This includes Proposed Amendments nos. 10, 12, 14, 19, 21, 22, 23, 24, 25, 27, 29 and 30. The NTA is also supportive of Proposed Amendment no. 26, which refers to the *Spatial Planning and National Roads Guidelines for Planning Authorities*, as this relates to a recommendation submitted by the NTA at the Pre-Draft Issues Paper stage of the JULAP preparation.

Active Travel links

Proposed Amendments nos. 15, 16 and 17 propose to remove three Permeability Links at Highfield/Oak Park (15), Sandhills (16) and Kearney's Lane (17) from *Section 6.3.4.1 Walking Strategy* of the Draft JULAP.

Permeability links at the local level are critical components of active travel networks in urban areas. Such links connect adjacent residential areas to each other, connect residential areas to active travel facilities and public transport services on main roads, and confer a competitive advantage on active

travel modes for short and medium length trips within the town, which accords with national policy as set out in the *National Investment Framework for Transport in Ireland* (NIFTI). Without such links, trips between proximate areas are often considerably longer, including trips from residential areas to education, employment and local services. This can result in increased private car use for local trip making, for those with access to a car, leading to a more congested road network. It can also result in more onerous and circuitous walking or cycling trips for those without car access, which often includes older people, people with disabilities and children. It can also diminish the value which would otherwise have applied, of the considerable investment by the state in active travel and public transport infrastructure and services to date.

The NTA is therefore concerned by the proposed removal of the three permeability links listed above, the rationale for which has not been stated in the Material Amendments documentation issued by the Councils, and recommends that these proposed permeability links should be retained in the Final JULAP.

Recommendation:

The NTA recommends that the permeability links proposed for removal in Material Amendments 15, 16 and 17 should be retained in the Final JULAP.

Zoning

Proposed Amendment no. 60 relates to a clarification of a 'zoning error' on the online version of the map. A site on map 12.1 in the Draft JULAP was zoned Open Space and Amenity, whereas the corrected version shows this site as zoned New Residential.

While the NTA notes the presentation of this proposed amendment as addressing an error, the basis for the intended zoning of the site as New Residential is not clear. The lands occupy a peripheral location, are not contiguous with the built-up area of the town and are severed from the town by the river. They are not currently served by the Carlow Town bus service (route CW2 terminates about 800m to the north at Ashgrove/Woodgrove), and would not be served by the active travel facilities on the distributor road, described in the Local Transport Plan (LTP) as a 'Proposed Off-Road Segregated' cycle route, i.e. not yet in place. The NTA would therefore query whether these lands, if developed for residential use, would be served by sustainable transport modes on the basis of current proposals, or if such development would give rise to car use for local trip-making. Furthermore, it is not clear why such peripheral lands have been zoned New Residential, when other lands closer to the town centre, served by both bus routes and existing active travel facilities, have been zoned Strategic Reserve.

Proposed Amendments nos. 61 and 62 relate to the proposed rezoning of two parcels of land to the north of the N80, from Unzoned to Strategic Reserve. The basis for these proposed re-zonings has not been stated and it is not clear why they have been proposed.

The two sites are immediately adjacent to the Sleaty Roundabout on the N80. Development in the vicinity of national roads must accord with the provisions of the *Spatial Planning and National Roads*

Guidelines for Planning Authorities (subject of Proposed Amendment no. 26), and on the basis of the information available in the Proposed Amendments documentation, it has not been demonstrated that the proposed re-zonings would fulfil this requirement. The NTA is concerned that any development that would occur on the basis of these zonings could jeopardise the safe and efficient operation of the national road network and the Sleaty Roundabout junction, and would therefore not be supportive of these two proposed amendments.

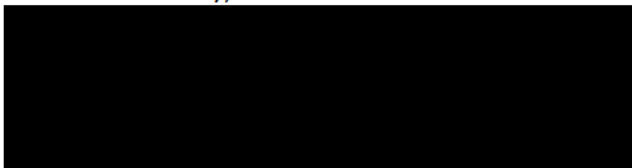
Recommendations:

The NTA recommends that Proposed Amendment no. 60 should be reviewed to ensure that any development that would occur on these lands could be effectively served by sustainable transport.

The NTA also recommends that Proposed Amendments nos. 61 and 62, as presented, would not accord with the provisions of the *Spatial Planning and National Roads Guidelines for Planning Authorities* and should therefore not be adopted.

I trust that the views of the NTA will be taken into consideration in the finalisation of the JULAP.

Yours sincerely,



Michael MacAree
Head of Strategic Planning