Senior Executive Officer

Planning Department

Carlow County Council

Athy Road

Carlow

2nd September 2021

 **Re: Draft Carlow County Development Plan 2022-2028**

Dear Sir/ Madam,

Since the previous plan was published there have been important policy developments which are relevant to accessible and integrated public transport. The Department of Transport (DoT) considers these should be reflected in the proposed Plan, and particularly in chapter 5 titled “Movement and Transport’. These include:

1. the publication of the “whole of Government” National Disability Inclusion Strategy (NDIS) 2017-2022, which includes specific actions assigned to Local Authorities. For example, action 108 relates to the ‘dishing’ of footpaths and action 109 relates to accessible infrastructure, including bus stops., ‘Dishing’ is where the footpath is sloped for wheelchair access and lack of the same, is often cited as a major concern for wheelchair users.
2. the ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to, inter alia, the physical environment and transportation in both urban and rural areas.
3. the DMURS Interim Advice Note – Covid-19 Pandemic Response which was published on the DMURS website in 2020. It includes guidance that designers should ensure that measures align with the principles of universal design, consider Government policy on accessibility for people with disabilities and consult people with disabilities to further appraise measures. References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.
4. To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’ which refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder in this regard in the context of ensuring a universal design approach to the built environment, including footpaths, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters. The DoT welcomes the Council’s Accessibility policy (ref :AC P1, Chapter 5.17) ‘to support suitable access for people with disability, including improvements to buildings, streets and public spaces’.
5. the publication by the National Transport Authority (NTA) of its ‘Local Link Rural Transport Programme Strategic Plan 2018 to 2022’. Its mission statement is “*to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs*.” Its key priorities include the reduction of social exclusion and the integration of rural transport services with other public transport services. In addition, one of its key objectives is greater interaction/co-ordination with Local Authorities regarding the assessment of strategic transport needs and in the development of proposed transport plans for local areas. The DoT notes, section 5.5.2 Bus and the paragraphs on Local Link.

Please note Section 5.1.1 makes reference to PLUTO, which was the working title for the Department of Transport’s forthcoming land transport investment framework, but which is no longer in use. It is suggested that the first sentence below, which is currently in the draft, is replaced with the second.

“The national investment priorities that will underpin the implementation of the National Planning Framework are contained in The National Development Plan 2018-2027 and will be further supported by the publication of the forthcoming  “Planning Land Use and Transport – Outlook 2040”  (in preparation by The Department of Transport, Tourism and Sport). PLUTO will comprise a long-term framework to support the prioritisation of transport interventions and investment.”

“The national investment priorities that will underpin the implementation of the National Planning Framework are contained in The National Development Plan 2018-2027 and will be further supported by the publication of the Department of Transport’s forthcoming long-term investment framework for land transport.”

Also, to note that the Draft Carlow Development Plan refers to Department of Transport (DoT) by its old acronym of DTTAS. Could you please review and make the necessary amendment.

Yours sincerely,

*Reform Communications Emergency Planning*

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**An Roinn Iompair**

*Department of Transport*

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