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1st October 2021

Re: Draft Carlow County Development Plan 2022 – 2028

The National Transport Authority (the NTA) has reviewed the Draft Carlow County Development Plan 2022 – 2028 and on the basis of the Regional Spatial and Economic Strategy (RSES) for the Southern Region and national policies and guidelines, submits the following observations and recommendations.

The NTA's Remit and Guiding Principles

Firstly, the NTA acknowledges the complex undertaking of the Council in preparing the draft Development Plan and the requirement to consider and address a multiplicity of factors in developing a sustainable and multi-faceted spatial planning framework of which transport policy and the integration of land use and transport planning is one important element.

The NTA has overall responsibility for public transport services in County Carlow. Over the period of the County Development Plan, the role of the NTA in the County is likely to develop further to incorporate some functions related to investment in walking and cycling infrastructure in urban areas, in order to assist the local authority in meeting sustainable transport objectives. The comments below are, in part, made in the context of this developing role and on the basis of the following Guiding Principles:

- For urban-generated development, the development of lands, within or contiguous with existing urban areas should be prioritised over development in less accessible locations. This is of particular relevance to the largest urban areas;
- To the extent practicable, residential development in urban areas should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport, including infill and brownfield sites, are prioritised;
- Larger scale, trip intensive developments, such as offices and retail, should primarily be focused into central locations in urban areas;
- As intensively used, central locations, the management of space in town centres should deliver a high level of priority and permeability for walking, cycling and public transport modes. The key outcome of such an approach would be town centres that are accessible, attractive, vibrant and safe, as places to work, live, shop and engage in community life;

- Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services and other services at the local level such as schools;
- New development areas should be fully permeable for walking and cycling and 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;
- The density and location of employment development should maximise the potential for the use of walking, cycling and public transport;
- Where possible, new residential developments should provide for filtered permeability, i.e. provide for walking, cycling, public transport and access by private vehicle, while restricting or discouraging through-trips by private car;
- Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport;
- The strategic transport function of national roads should be maintained and protected in accordance with national policy;
- All non-residential development proposals should be subject to maximum parking standards;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied – of particular relevance to the larger urban areas; and
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and should be carried out in a manner consistent with existing NTA guidance.

The NTA notes the emphasis which Section 5.2 and Policy LT.P1 place on the integration of land use and transportation and would support its implementation, in complement with the above Guiding Principles.

Chapter 2 – Core Strategy and Settlement Strategy

2.8.1 Key Town - Carlow

Policy CSP. 3, in complement with Public Transport Objective PT. 01 requires the preparation of a statutory Joint Urban Area Plan for the Greater Carlow Urban Area with Laois County Council which is to be informed by a Local Transport Plan in accordance with the Area Based Transport Assessment Guidelines, produced by the NTA and TII and prepared in consultation with the NTA and TII. The NTA supports this objective and is willing to work with the Council in facilitating its preparation.

Typically, an LTP for an urban settlement would represent the lowest tier of the NPF's framework for the integration of land use and transport planning and the achievement of compact smart growth. It is intended that LTPs 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.

2.8.2 District Towns

Policies CSP. 5, CSP. 6 and CSP. 7 which promote compact growth and consolidation in District Towns in line with the settlement hierarchy and in locations with strong sustainable travel links are also supported and would recommend that a local transport planning process is undertaken to support the preparation of any associated local area plans, providing a robust evidence basis for the integration of land use and transport planning. The NTA is willing to work with the Council in determining the requirements for local transport planning in settlements of this size.

Chapter 5 – Sustainable Travel and Transportation

5.3 Sustainable Mobility / Modal Shift

Table 5.1 outlines the mode split for the county and for certain settlements extracted from the 2016 Census of Population. The NTA would recommend that consideration should be given to the level of mode share that can be achieved for identified settlements, as well as to the county as a whole. Such mode shares should be achievable, taking account of the transport and movement context for each settlement, i.e. the availability of public transport, and current trip patterns for intra- and inter-settlement travel. Measures for the achievement of mode share targets should then be identified through the development of the Local Transport Plans, referred to above. The NTA would be willing to work with the Council on the development and analysis of sustainable transport indicators, in conjunction with the Office of the Planning Regulator.

Section 5.5 Public Transport

The NTA would support the provisions of Objectives PT. 01 to 05 which seeks to improve the public transport offer in both urban and rural areas.

In terms of public transport service provision, the NTA has statutory responsibility for securing the provision of public transport services, which, with respect to Carlow, would relate to:

- A Public Service Obligation (PSO) contract between the NTA and Irish Rail;
- A PSO contract between the NTA and Bus Éireann;
- Direct award contracts for the operation of bus services; and
- The licencing of commercial bus services.

In addition, the NTA provides rural transport services through the *Local Link Rural Transport Programme*. The key priorities of this programme continue to be directed at addressing rural social exclusion and the integration of rural transport services with other public transport services.

Planning for Bus Service Provision

Carlow is currently served by a network of bus services, connecting rural areas, linking settlements and connecting with major destinations.

The NTA notes the critical importance which the Draft Development Plan places on the provision of these services to the community in order to achieve more sustainable travel patterns and a reduced reliance on the car. The implementation of development plan policies will have a critical role to play in facilitating the improvement in public transport accessibility and the delivery of effective public transport services through supportive land use policies and design standards as referred to under the 'Guiding Principles', above.

In this regard, it is recommended that the Development Plan includes a policy to support and develop public transport routes throughout the county through collaboration with the National Transport Authority. Development Plan policies should also take cognisance of the opportunities presented by investment currently being committed to the improvement of bus services and supporting infrastructure for the appropriate consolidation of future development in areas which support accessibility to and the use of public transport.

The NTA also recommends that policies are included which ensure that public transport infrastructure is considered as part of any significant residential or commercial development. This would include an evaluation of the requirement for new bus stops, turnaround facilities, pedestrian access and layover facilities.

In addition, the NTA recommends that the requirements of public transport should be considered in all plans and projects relating to the county's urban settlements, including local area plans, traffic management schemes, and public realm improvement schemes. This would include, *inter alia*, suitable infrastructure on public transport corridors to improve safety and efficiency for public transport users, including retro-fitting within existing development areas.

Provision of Public Transport Services in Rural Areas

This is a matter of particular importance for Carlow, given the rural nature of large parts of the county and an associated pattern of small urban settlements and rural hinterlands. The rural economy and the rural social fabric should be supported through the provision of better local connectivity and connectivity to services and commercial activities located in cities and towns.

The NTA provides rural transport services through the *Local Link Rural Transport Programme*. The key priorities of this 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 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.

It is recommended that the Development Plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns.

5.1.4 Car Parking, Chapter 16 Table 16 Car Parking Standards

The NTA supports the draft Development Plans use of maximum standards, in particular for non-residential land uses. In addition, in locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be considered. Furthermore, it is recommended that in order to determine the most appropriate level of parking provision within the maximum standards specified, criteria relating to public transport accessibility levels (PTALS) and access to opportunities and services (ATOS) should be applied, from which degrees of constraint can then be applied. Within the larger urban settlements, this approach would be best supported by the preparation of Local Transport Plans.

5.15 Bicycle Parking Facilities, 16.10.13 Cycle Parking, Table 16 Cycle Parking Standards

Cycle parking at trip origins and destinations is a key factor in determining mode choice, and should be appropriately designed into the urban realm and new developments to ensure that adequate facilities are provided. In this regard, the inclusion of Bicycle Parking Standards, specified as minima in the Draft Development Plan is supported.

To informing specific policies relating to the provision and design of cycle parking in the urban realm and in private developments, the NTA would recommend the *Standards for Cycle Parking and Associated Cycling Facilities for New Developments* document issued by Dun Laoghaire-Rathdown County Council in 2018, which includes comprehensive guidance on the design of cycle parking.

(http://www.dlrcoco.ie/sites/default/files/atoms/files/dlr_cycle_parking_standards.pdf).

I trust that the views of the NTA will be taken into consideration in the finalisation of the County Development Plan, and the NTA is available to discuss in further detail any issues arising from the comments and recommendations included in this submission.

Yours sincerely,

A handwritten signature in black ink that reads "Michael Mac Aree". The signature is written in a cursive style with a horizontal line underneath it.

Michael Mac Aree
Head of Strategic Planning