

Senior Executive Officer  
Draft Carlow County Development Plan, 2022 – 2028  
Planning Department  
Carlow County Council  
Athy Road  
Carlow

On-line Consultation Portal: <https://consult.carlow.ie>

Dáta | Date  
10 March 2022

Ár dTag | Our Ref.  
TII21-117371

## Re. Notice of Proposed Material Alterations to The Draft Carlow County Development Plan 2022-2028

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on the Proposed Material Alterations To The Draft Carlow County Development Plan 2022-2028 .

TII's observations, provided in the following submission, seek 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. To that effect TII provides the following comments for the Council's consideration:

### **AMENDMENTS**

- Amendment No. 22- Insert additional Policy to Section 4.4.1 'Locations for Economic Development - Policies' (page 78), new text in green as follows: ED P3: To drive economic growth arising from opportunities within Carlow due to its strategic location and connectivity on the Waterford-Kilkenny-Carlow-Dublin M9/Rail Network, to support collaboration and growth with strategic settlements on this route and to support the creation of Inter Urban Networks of Collaboration and Growth in accordance with RPO 30 .**

TII supports the approach taken in the Draft Plan in relation to the integration of spatial planning and transport policy. Similarly, in identifying future strategic employment locations associated with the M9 , TII would encourage an approach that promotes compact growth and consolidates existing strategic employment locations that can be best served by public transport and active travel initiatives while also building on existing established business/industry and third level synergies.

In relation to identifying proposals for an appropriately located economic developments and having regard to the nature of trips generally associated with such facilities, in the interests of safeguarding the capacity and strategic function of the national road network in the area in accordance with Government policy, it will be critical that any identified lands are well served by public transport and active travel modes in accordance with principles outlined in the SRA RSES and the DoECLG Spatial Planning and National Roads Guidelines in addition to national road network accessibility requirements.

Transport Assessment, including the cumulative impact of development, will need to be undertaken to ensure planned development can be accommodated complementary to safeguarding the strategic function of the national road network and associated junctions where such proposals are brought forward for consideration in the vicinity of the strategic motorway and national road network.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
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Consultation with relevant stakeholders in relation to the identification of a location and preparation of any locations for economic development is considered critical and TII considers that a plan-led approach is essential.

The DoECLG Spatial Planning and National Roads Guidelines require that planning authorities exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network. Therefore, any proposals in the vicinity of junctions on a national road should be developed in accordance with the provisions of the DoECLG Guidelines.

### **Recommendation**

TII would welcome consideration by the Council of that any proposals for employment locations on the Waterford-Kilkenny-Carlow-Dublin M9/Rail Network should be plan-led and brought forward in the context of the RSES Regional Freight Strategy. Where such proposals are identified in the vicinity of the strategic motorway and national road network, they should be developed in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines and consultation with relevant stakeholders is considered critical.

2. Amendment No. 156- Amend Kildavin Land Use Zoning Map to rezone land from 'New Residential' and 'Existing Residential/Infill' to 'Agriculture, and extend village boundary to zone land (1.5ha) 'New Residential' with corresponding specific objective **It is an objective of the Council to facilitate low density residential development (max. no. 15 no. units) subject to high-quality design and siting considerations, which will provide for an integrated development, and which shall also provide high quality landscaping and public open space provision and shall comply all other proper planning and sustainable development considerations as appropriate.**

TII notes the proposal to zone lands New Residential Lands to the west of the slips of the N80 .

Section 2.7 of the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads.

TII is not aware of any analysis undertaken by the Council to develop an evidence base, in accordance with the provisions of official policy, to establish potential implications for the strategic national road network in the area and to support the proposed zoning at this location.

### **Recommendation**

The Council is requested to review New Residential zoning to the west of the slips of the N80 this zoning taking account of by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) to ensure zoning can progress complementary to safeguarding the strategic function and safety of the national road.

### **CLARIFICATIONS**

TII again requests cross referencing in Sections such as 'Single Houses in the Countryside' Rural Enterprise categories and Retailing in Rural Areas referring to Policy NR. P2 of the Draft Plan to avoid the creation of any new direct access points from development or the generation of increased traffic from existing accesses to the national road network to which speed limits greater than 50 km/h apply, in accordance with the DoECLG Spatial Planning and National Roads Guidelines.

TII is of the opinion that such a cross reference would provide clarification and early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network in the area and clearly identify, at an early stage, any policy conflicts related to access to national roads for the applicants to consider. This referencing would be a clear matter for the accessibility and transparency of the final draft development plan which should be addressed.

### **CONCLUSION**

The Authority acknowledges the significant undertaking for the Council in drafting development plans and the requirement to consider and address a multiplicity of factors in developing a sustainable spatial planning framework not just issues relating to national roads.

The Authority acknowledges and welcomes the alignment in the Draft Plan with official policy concerning development planning and development management and national roads and compliments the Council in this regard. Notwithstanding, there are a number of specific interactions, as discussed in the foregoing, between land use policy, development objectives and the strategic national road network in Carlow included in the amendments that the Authority considers require review prior to the adoption of the Development Plan.

The Authority is available to meet the Executive of the Council to discuss any issues arising in the foregoing or other matters related to the County Development Plan and national roads. TII would welcome future consultation on local area plan and local transport planning undertaken by the Council where there may be implications for the strategic national road network.

It is respectfully requested that the above observations are taken into consideration prior to the adoption of the Carlow County Development Plan, 2022 – 2028.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tara Spain', written over a horizontal line.

Tara Spain  
Head of Land Use Planning.