

Senior Executive Officer
Planning Department
Carlow County Council
Athy Road
Carlow

23rd March 2022

Re: Material Alterations – Draft Carlow County Development Plan 2022-2028

Dear Sir/Madam,

The National Transport Authority (NTA) welcomes the referral of the Material Alterations to the Draft Carlow County Development Plan 2021 and recommends the following matters need to be considered prior to the adoption of the Draft Development Plan.

Chapter 2: Core Strategy and Settlement Strategy

Amendment No.7

The NTA supports the amendment which provides for an objective to carry out an ABTA for the district towns of Tullow and Muine Bheag as an iterative process with the review of the relevant local area plan. The NTA is willing to work with the Council in determining the requirements for local transport planning in settlements of this size.

The NTA and TII have prepared an Advice Note, Pilot Methodology and for the preparation of ABTAs along with Template Briefs for the preparation of local transport plans, using the ABTA methodology. These can be found on the NTA web site:

<https://www.nationaltransport.ie/planning-and-investment/strategic-planning/guidance-documents/>

Chapter 5: Sustainable Travel and Transport

Amendment No.27

The following change is recommended: ‘Department of Transport’s forthcoming ~~long-term investment framework for land transport~~ **National Investment Framework for Transport in Ireland (NIFTI)**’.

Amendment No.29

In relation to the 28% sustainable mode share target for 2028, referenced in Objective MS. O1, the NTA would reiterate the recommendation made in its submission on the Draft Development Plan 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’.

Amendment No.30

The NTA would support the proposed additional objective MS O2, with the following suggested change: ‘To **prepare local transport plans, based on the** ~~carry-out an~~ Area Based Transport Assessment (**ABTA**) **approach**, in consultation with NTA, TII, **public transport service providers** ~~and~~ and **other** relevant stakeholders ... ‘

Amendment No.31

In relation to Section 5.5.1 ‘Rail’ and the additional text added, it is noted that reference is made to ‘The Rail Vision 2030: The Future of Rail Transport in Ireland’, ‘their Strategy 2027’ and ‘Rail Freight 2040’.

It should be noted that an All Island Strategic Rail Review is now being undertaken. The Review will consider how the rail network on the island of Ireland can improve to promote sustainable connectivity into, and between, the major cities, enhance regional accessibility and support balanced regional development. The Review will look at how the railways are used, how they could be used in future and how the network can evolve to serve the people on the island of Ireland and achieve policy goals. <https://www.gov.ie/en/consultation/61e8b-all-island-strategic-rail-review/>

It should also be also noted that the Rail Freight 2040 Strategy has now been published:

https://www.irishrail.ie/Admin/getmedia/685e9919-f012-4018-879b-06618bb536af/IE_Rail-Freight-2040-Strategy_Public_Final_20210715.pdf

The Rail Freight Strategy examines opportunities for the expansion of rail freight volumes across the Irish Rail network over the next 20 years. It has been developed based on extensive stakeholder engagement, demand assessment and analysis. The strategy proposes a series of interventions under five investment pillars that look to support this goal:

- Enhancing connections with seaports;
- Developing a network of inland ports
- Addressing rolling stock requirements;
- Network developments; and
- Policy initiatives.

Amendment No.33

The following changes are recommended: ‘PT. P2: Support transport agencies, including the National Transport Authority (NTA) **and public transport service providers** ~~and Iarnród Éireann~~, in the provision of new public transport services ... ‘

In the case of the proposed additional objective PT. P4, reference should also be made to the role of Local Transport Plans in informing the integration of land use and transport planning at settlement level.

Amendment No.37

The proposed additional text in paragraph 5.41 (Car Parking), states that ‘Flexibility in car parking standards for development (including residential) may also be applied in urban infill and brownfield sites in urban area based on performance criteria in order to achieve targeted growth.’ It needs to be clarified how this provision would actually be applied. The Draft Development Plan already specifies Maximum Parking Standards which should, by definition, allow for the most appropriate level of parking provision within the maximum stated value.

The NTA would reiterate the recommendation in its submission on the Draft Development Plan that, 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.

Amendment No.38

The proposed additional Policy CS P7 within Section 5.14 (Car Parking) provides for the application of ‘flexibility where appropriate in response to well designed development proposals that can achieve urban infill and brownfield development objectives ... ‘.

In the context of the maximum parking standards specified in the Draft Development Plan, it needs to be clarified how this ‘flexibility’ would be applied in determining parking provision. Whilst it is assumed that the intention is to allow for a reduced standard, below the maximum stated value, this should be explicitly stated and should in any case be implicit in the manner in which maximum parking standards are applied.

It is requested that the foregoing comments and observations are taken into consideration by the Council and in this regard, the NTA would welcome an opportunity to meet to further discuss the issues raised.

Yours sincerely,



Michael MacAree

Head of Strategic Planning