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14th October 2022

Re: Pre-Draft Public Consultation, Carlow-Graigecullen Joint Urban Local Area Plan 2023-2029

Dear Sir / Madam,

The National Transport Authority (the NTA) welcomes consultation on the review of the Carlow-Graigecullen Joint Urban Local Area Plan and submits the following observations for the Council's consideration.

The NTA's Remit and Guiding Principles

The NTA has overall responsibility for public transport services in County Carlow. The role of the NTA in the County is developing further, incorporating some functions related to investment in walking and cycling infrastructure and the preparation of local transport plans, 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.

Chapter 6. Movement and Active Travel

Under 'Land Use and Transport Planning' the NTA notes the emphasis placed on the development of 'an integrated approach to land use and transport planning, including policies which support realistic walking and cycling distances from residential, employment, educational, shopping and amenity areas'. The important role of the local transport plan (LTP) is also emphasised, as an integral element in the plan making process which will 'aim to maximise the opportunities for the integration of land use and transport planning in the urban area'.

This approach is supported, as being consistent with the NTA's view that the preparation of local area plans should be prepared in conjunction with the preparation of local transport plans and that this process should be informed by the NTA/TII *ABTA Guidance Document - Pilot Methodology*.

The LTP represents 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.

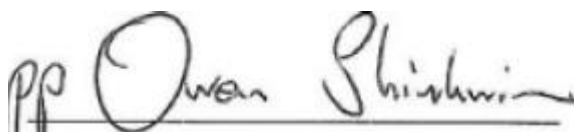
The NTA will continue to work with the Council in its preparation of the Local Transport Plan.

In addition to the above, NTA recommends that the preparation of the Local Area Plan is informed by the following NTA guidance, available on the NTA web site:

- The National Cycle Manual;
- Permeability: A Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers; and
- Toolkit for School Travel.

I trust that the views of the NTA will be taken into consideration in the preparation of the Local Area Plan and would be available to discuss issues arising from the comments made.

Yours sincerely,


Michael MacAree
Head of Strategic Planning