

Seán McKeown  
Head of Enterprise  
Local Enterprise Office  
42 Parliament Street  
Kilkenny

30th November 2015

**Re: Kilkenny Local Economic and Community Plan 2015-2021 - Draft Actions.**

Dear Seán,

The National Transport Authority ('the Authority') welcomes the opportunity to comment on the Draft Actions of the Local Economic and Community Plan (LECP) for Co. Kilkenny.

The Local Government Reform Act 2014 amended the Planning and Development Act. The requirement for the formulation of LECPs was among those amendments. The stated purpose of an LECP is to agree the economic and community development objectives for the county and the set of actions needed to achieve these over a six-year period across all the sectors that will influence that development.

Section 66C (1) of the Planning and Development Act of 2014 states the general matters to which local authorities and the Local Community Development Committee must have regard in preparing the LECP. This includes the following subsections:

- (c) 'the need for co-operation with, and the co-ordination of its activities with those of other local authorities, public authorities and publicly funded bodies, the performance of some of whose functions affect or may affect the local authority and the Committee' and
- (d) the need for consistency with the policies and objectives of the Government or any Minister of the Government or other public authority in so far as they may affect or relate to the promotion of economic and community development as provided for in sections 66B(2) and 66B(3).

In relation to the above, the Authority makes the following comments on the LECP for Co. Kilkenny.

## **The Role of the National Transport Authority**

The Authority has statutory responsibility under the Dublin Transport Authority Act of 2008 and the Public Transport Regulation Act of 2009 for securing the provision of public passenger land transport services throughout the State, by:

- contracting public service obligation (PSO)<sup>1</sup> public transport services, by bus, rail, local link (rural) bus and rural taxi / hackney, and
- licencing public transport services provided on a commercial basis by bus, coach, taxi and hackney.

The forthcoming Regional Spatial and Economic Strategy process will involve the formulation of Regional Transport Strategies by each Regional Assembly. Those Transport Strategies will establish the overall objectives for investment in transport services and infrastructure at the regional level. It is therefore important that the objectives and actions proposed in the LECP for Kilkenny are cognisant of travel patterns and transport demand at a regional level. The regional travel patterns and transport demand that are relevant to Kilkenny are those trips entirely within Kilkenny, trips between Kilkenny and other settlements and counties, and trips that pass through the county.

It is recommended that the LECP includes recognition of the role that the Authority fulfils in relation to transport services, as those services relate to travel patterns in Co. Kilkenny.

The Authority determines in the case of each PSO contract the level of service to be provided and the funding to the operator to provide that level of service. It is recommended that the Council contact the Authority in the first instance when seeking enhanced or new public transport services and the development of integrated transport services in any area to discuss its needs.

## **Specific Comments on the Draft Economic Actions**

*Goal 6 Improve Access and Communications Infrastructure* is supported by the high-level objective to *'encourage integrated transport systems through the use of existing and new infrastructure innovations...'*

It is recommended that the local authority should revise the wording of the overarching objective to recognise the importance of planning principles and the location of development to contributing to sustainable and integrated transport systems, rather than focusing solely on infrastructure innovations. The Authority recommends the following local development principles for inclusion. They would be subsidiary to any overarching objectives:

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<sup>1</sup> Section 47 of the DTA Act of 2008 defines public service obligation as 'a requirement specified by the Authority in order to ensure public passenger transport services in the general economic interest which a public transport operator, if it were considering its own commercial interests, would not assume or would not assume to the same extent or under the same conditions without reward'.

- 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 the city, town or village centre, public transport services and other services at the local level such as schools; and
- 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 and employment areas. Provision of links for walking and cycling, and where possible public transport, should be as direct as possible, in order to give those modes a competitive advantage and encourage their use as an alternative to the private car (The Authority's guidance document Permeability Best Practice Guide can be referred to).
- The role and function of city, town and village centres should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling;

The document *Kilkenny Local Economic and Community Plan 2015-2021 - Draft Actions* recognises the role of Kilkenny City as the largest centre within the county generating significant demand for travel, the majority of which is by car. It also recognises the compact nature of Kilkenny City Core, its suitability to walking and cycling, and refers to traffic calming and park-and-ride as mechanisms for improving the attractiveness of the city. It is the view of the Authority that the stated draft transport Actions, Actions A35-A37, could be revised to more adequately encompass this multi-modal approach.

Action A37 is to '*develop a linked County and City Integrated transport service*'. The Authority recommends that this action should be revised to provide for the development of an 'integrated transport plan' for Co. Kilkenny, to deliver transport for all trip types, based on the existing and future forecast demand for travel. A plan for public transport service provision should be an integral part of this, and it is the view of the Authority that the existence of such a plan, and the availability of the information on travel demand upon which the plan is based, would assist the Authority in planning for its contracting and licencing functions referred to in describing the role of the Authority, above. The LECP should state that any integrated transport plan for Kilkenny should be finalised subsequent to, and fully align with, the Regional Transport Strategy that is to be progressed by the Southern Regional Assembly as part of the Regional Spatial and Economic Strategy.

I trust that these views will be taken into consideration in completing the Local Economic and Community Plan. The Authority is available at any stage to discuss these issues further with you.

Yours sincerely,



**Michael MacAree**

Head of Integrated Strategic Planning.