

Roscrea Local Area Plan
Tipperary County Council,
Planning Department,
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Nenagh

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24th July 2023

Re: Proposed Material Alterations to the Draft Roscrea Local Area Plan 2023-2029

Dear Sir/Madam,

The National Transport Authority (the “NTA”) acknowledges receipt of referral of the Proposed Material Alterations to the Draft Roscrea Local Area Plan, 2023-2029.

The NTA welcomes a number of the proposed amendments that arise from the Council’s consideration of the NTA’s initial submission on the Draft Local Area Plan. These include proposed amendment no. 16 (Section 6.2) and no. 40 (Section 3.5).

In the case of material alteration no.41 (Section 3.51) whilst an ATOS analysis has been undertaken for the growth proposals under the LAP, it is indicated that ‘no changes to the baseline scenario for walking to employment areas’ has been achieved. As stated in the NTA’s original comments on Section 3.5.1, ‘the identification of Development Objectives and associated Transport Measures would be undertaken in an iterative manner so as to optimise the sustainable development outcomes. In this way, the LAP and associated Sustainable Transport Plan could clearly demonstrate how identified sustainable transport measures contribute to the objectives of development consolidation, the maximisation of accessibility to key destinations within the town by walking and cycling.’ It is not clear why an improved outcome could not have been achieved for employment destinations.

Material alteration no.42 (Section 3.5.2) - in the case of education sites, a small increase in walking and cycling catchment has been indicated.

In the case of material alteration no. 43 (Section 4.0), it is noted that the NTA’s concerns regarding the discrepancy between the LAP and County Level mode share targets have been addressed insofar as mode shift targets for employment and education have been brought into line with County targets and Education targets are presented as an absolute minimum target, ‘given its urban profile and the strong potential for local trips to education to be undertaken in large proportion, by walking and

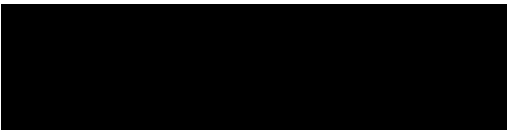
cycling and through use of public transport'. The NTA would favour a similar approach being applied to employment related targets.

In the case of section 6.4 Roads Strategy, Policy 6.5 & Objective 6E (new western relief route), in its original comments, the NTA emphasised 'the need for investment in any additional road capacity to be justified through a clear demonstration of the benefits arising, in terms of reducing dependency on the private car, facilitating the effective operation of and access to public transport services into and through the town and facilitating the use of walking and cycling modes for local trip making. This approach would be consistent with the National Investment Framework for Transport in Ireland Intervention Hierarchy of *1. Maintain, 2. Optimise, 3. Improve and 4. New*'. Whilst reference has been made its provision in accordance with NIFTI principles, further clarification on how the above concerns are going to be addressed is recommended.

Conclusion

The NTA respectfully requests that the foregoing observations are taken into consideration by the Council, prior to the adoption of the Local Area Plan.

Yours sincerely,



Michael MacAree

Head of Strategic Planning