

Clonmel Local Area Plan,
Planning Department,
Tipperary County Council,
Civic Offices,
Emmet Street,
Clonmel,
Co. Tipperary E91 N512.

11th September 2023

Re: Draft Clonmel Local Area Plan 2024-2030

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Draft Clonmel Local Area Plan 2024-2030* ('Draft LAP') and associated *Local Transport Plan*, based on its role as the body responsible for public transport planning and the management of investment programmes for active travel, and submits the following observations and recommendations for the Council's consideration.

General Comments

The NTA is supportive in principle of the approach being taken to the preparation of the Local Area Plan for Clonmel and, in particular, the manner in which Tipperary County Council has developed an evidence-based Local Transport Plan to accompany the Draft Local Area Plan, setting out a framework for transport investment in the settlement.

There are a number of recommendations set out below which, in the view of the NTA would serve to strengthen the integration of transport planning and land use planning in Clonmel and foster greater potential for sustainable transport use. There are also a number of recommendations which seek to provide greater clarity on some detailed matters.

Overall, however, the NTA is of the view that the Draft Local Area Plan provides a good basis for the future development of Clonmel, based on the integration of land use and transport planning.

Transport and Connectivity (Chapter 6)

Introductory Remarks

The Transport and Connectivity policies and objectives in the Draft LAP have been informed by the Local Transport Plan (LTP), which was prepared on the basis of the *Area-Based Transport Assessment* (ABTA) process and methodology developed by the NTA and Transport Infrastructure Ireland (TII).

The aim of this approach was to put in place an effective means of assessing the current transport issues facing Clonmel, identifying measures to address these current issues and proposing measures to serve the future transport demand. During the course of the LTP's preparation, the Council engaged with the NTA and other key stakeholders.

The ABTA process is designed to be iterative, with the LAP preparation being informed by and, in turn, informing the development of transport policies and objectives. The NTA would anticipate that the final set of transport policies and objectives in the LAP will set a baseline to inform future reviews of the LAP. The ABTA process also envisages that future iteration between statutory plans and transport studies would be informed by the monitoring and evaluation stages of the LAP. In particular, the development of public transport schemes along with connected networks for active travel will allow for the review of zoning objectives. This would support the achievement of the transport-related National Strategic Outcomes included in the National Planning Framework, which have guided the preparation of the Draft LAP. The NTA looks forward to further engagement with the Council in this regard.

The NTA would support the high level objectives presented at the start of Chapter 6 and would also acknowledge that the policies and objective align in large measure with the recommendations of the Local Transport Plan.

However, given the central role which the LTP was intended to have in the formulation of transport policies and objectives and more generally in effecting the integration of land use and transport policy making to provide for sustainable development outcomes, this role is not considered to have been adequately represented in Chapter 6.

With this concern in mind, **the following high level recommendations** are made, with the aim of presenting the LTP process as having a more central role in the preparation of the LAP:

- It is recommended that a greater level of cross referencing between the LAP written statement and the LTP is included in this and other chapters;
- In addressing the above recommendation, Chapter 6 would benefit also from the inclusion of greater detail on the proposed measures, with a particular emphasis on tabulated and graphically presented material, providing a clearer basis for the Policies and Objectives presented in Section 6.6;
- Chapter 6 in its current form, does not seem to represent the full scope or adequately reflect the process by which the LTP informed the preparation of the LAP. It is recommended that this is addressed in the structure and content of the chapter;

- Related to the above point, as currently presented Sections 6.1-6.5 set out a high level contextual overview of a number of transport policy areas, followed by the long list of detailed policies and objectives, without clear explanation of how these policies and objectives were derived.
- In relation to stated purpose of the LTP as presented in the opening paragraph, it is recommended that this is expanded to refer its role in informing the integration of land use and transport planning. As stated above, the ABTA process is designed to be iterative, with the LAP preparation being informed by and, in turn, informing the development of transport policies and objectives.

6.3 Demand Management

It is recommended that a greater emphasis is placed on the importance of parking at destination as a key influencing factor of mode choice, through both the managing of public parking in the town centre and other destinations and the manner in which the County Development Plan’s maximum parking standards are applied for new developments. See comments under LTP section 4.4.

The NTA also notes that cycle parking has not been addressed in detail, in the LAP. While a comprehensive list of cycle parking locations would be beyond the scope of an LAP or LTP, the NTA recommends that a policy regarding the provision of secure, public cycle parking at key destinations should be included in the final LAP and LTP. Such a policy should note that the implementation of cycle parking, particularly if provided as clusters, must take account of Universal Design principles to ensure that it does not discommode disabled pedestrians, wheelchair users, or pedestrians with visual impairments.

The NTA would recommend that the LTP and LAP should include a commitment to the development of a town centre Parking Strategy, which would consider the potential for the migration of on-street car parking to sites on the town centre edge. Where feasible, parking facilities would be located on active travel routes to facilitate onward journeys by active modes, and should consider the provision of e-charging facilities. The removal or reduction of on-street car parking would present an opportunity to reallocate road space to alternative uses, including public realm enhancements. Such reallocation would be of particular benefit on routes identified as part of the cycle and walking networks. Where such reduction is proposed, care is required to ensure that provision is made for disabled motorists and loading/delivery requirements.

6.4 Roads Strategy, Policy 6.5 & 6.6

Section 6.4 outlines, inter alia, the proposed N24 upgrade project, including reference to the four road links ‘aimed at providing connections for local trips to relieve existing congestion identified on the Clonmel Bypass’, also stating the Council’s support for their delivery, ‘identified as part of the transport solution for Clonmel’. Related to this, Policy 6.5 refers to the preservation of the study area and option corridors, ‘including the proposed Road Links’ and Policy 6.6 includes a requirement that ‘the proposed Road Links, which form part of the preferred transport solution, once finalised, as part of the N24 Waterford to Cahir Road Project, are provided for as part of new developments, ... ‘.

Comment and Recommendation – The draft LAP appears to confirm that the four link road options form part of the preferred transport solution for the scheme. It is the NTA’s understanding that as the public display of the preferred option is not anticipated before Q4 2023, as such this is considered to be premature. It is therefore recommended that Section 6.4 and Policy 6.5 are amended as appropriate and Policy 6.6, omitted from the LAP.

Content of Local Transport Plan (Appendix 2)

The NTA welcome the preparation and publication of the Draft Clonmel Local Transport Plan (LTP), in general accordance with NTA/TII Guidance, based on empirical evidence and on an ambitious approach to investment in walking, cycling and public transport.

Whilst the LTP does provide a broadly based framework for investment in sustainable transport infrastructure and services, in finalising the Plan, the NTA would make the observations and recommendations for the Council’s consideration:

3.3 Future Demand for Travel

This section explains how future demand for travel was informed by an assessment of appropriate lands for future potential development, with account being taken of existing development patterns, also.

This section would benefit from further explanation on how and to what extent proposed land use zoning was influenced by the combined LAP/LTP (iterative) process and the associated objectives informing this, including the facilitation of compact, consolidated development.

A graphical representation of the population and employment growth distribution used for the purposes of the LTP future year scenario would also provide greater clarity on the assumed relationship between land use outcomes and associated future demand for travel.

4.4 Demand Management & Supporting Measures Options

Given the important influence which the availability of parking at destination can have on mode choice, the LTP would benefit from a further explanation of how the application of the County Development Plan’s maximum parking standards for new developments could be combined with other proposed demand management interventions and the criteria which would inform same, including centrality, public transport accessibility, proximity to local services, development density and mix of uses.

6.2.3 N24 Corridor

See comments above, under Chapter 6, Section 6.4.

6.2.4 Town Centre Public Realm and Active Travel Proposals

Given the critical importance of the quantum, function, location and access arrangements for parking in achieving the stated town centre objectives, including how the provision/management of parking for new development is determined, this section of the LTP would benefit from more detail on how

the functions of parking, public transport, local traffic management, provision of walking / cycling and public realm improvements would be reconciled. If it is the intention that further details on the scale/location/management of off-street parking would be developed as the various town centre measures are implemented, it is recommended that the specific reference is made to this and that an outline of the process governing this approach is provided. See also, recommendations under LAP Section 6.3, above.

6.2.5 Connectivity to Future Zoned Land

It is recommended that more specific reference is made in the introductory paragraph to the need to provide for permeability in new developments and between existing and new development areas, providing, for example, for walking and cycling connectivity between new and existing residential areas.

Employment Lands

In relation to the lands zoned for employment development ('Strategic Employment Site') to the north west of the town, the very large extent of lands, combined with a lack of specificity on the time frame, phasing or overall quantum of employment envisaged on these lands and associated trip demand/demand patterns, presents a high degree of uncertainty on how the proposed measures presented in the LTP would provide the basis for the sustainable development of this area for large scale employment development.

6.4 Road Network

Future Road Reservation

The recommendation that full active travel connectivity be included with any future road scheme serving the Ballingarrane Business, Science and Technology Campus (Strategic Employment site), in reference to the link roads, presented in Figure 6.21. Whilst noting that, with consideration of the forecast growth over the lifetime of this LTP there is deemed to no need to include these road links as specific measures, it is not clear if or to what extent employment growth is considered could be accommodated in advance of their completion and how this development would be served in manner which is consistent with the sustainable development objectives underpinning the LTP.

6.5 Demand Management and Supporting Objectives

As stated above under Section 4.4, given the important influence which the availability parking at destination can have on mode choice, the LTP would benefit from a further explanation of how the application of the County Development Plan's maximum parking standards for new developments could be combined with other proposed demand management interventions and the criteria which would inform same, including centrality, public transport accessibility, proximity to local services, development density and mix of uses.

7.5 Demand Management and Supporting Measures

See comments on parking, in section 4.4 and 6.5.

Serviced Land Assessment (Appendix 1)

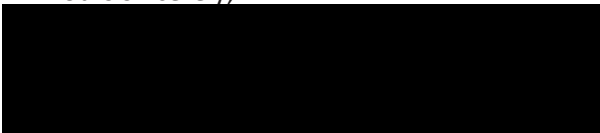
Table 2 (SLA for lands available for employment use)

It is recommended that the criteria presented in Table 1 (SLA for lands available for new residential development) are also applied to employment, with explicit reference to the Sustainable Planning Criteria as presented. The achievement of a reduction in car dependence, the facilitation of sustainable transport and the achievement of development consolidation is as applicable to land uses 'at trip destination' as they are to land uses 'at trip origin'.

In relation to the assessments of lands 'available for employment use', it is noted that sites referenced 1 and 2 have been assigned a category score Tier 1. Given the large extent of these greenfield sites and the current lack of supporting transport infrastructure over most of the area concerned, it is questionable whether the interpretation and application of the 'availability of infrastructure at the site' is a fair representation of their current availability for employment use. Rather, the sites are very large scale, with little supporting infrastructure over most of their areas, presenting significant challenges in terms of local connectivity within the town by sustainable transport and requiring a substantial level supporting transport infrastructure and services.

The NTA respectfully requests that the foregoing observations are taken into consideration by the Council prior to the adoption of the Clonmel Local Area Plan, 2024 – 2030.

Yours sincerely,



Michael MacAree

Head of Strategic Planning