

A new Submission has been received to the Draft Nenagh Local Area Plan 2024-2030

Submission ID: NLAP-23

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Local Area Plan

I have a general comment about the pattern of development of Nenagh, and that is that the focus of development in Nenagh appears to be at the edge of the town. Recent housing developments in Drummin Village and the Fiserv building on the Limerick Road are two examples of recent developments that, while welcome from the perspective of housing and employment respectively, are located quite a distance from the town centre and are designed to be primarily accessed by private car. The traditional layout of Nenagh is compact and sustainable, but these recent developments have served to undermine this. I worry that the pattern of zoned lands in the Local Area Plan will continue to support sprawl at the edge of town, especially as Greenfield development will be cheaper for property developers than building on any of the brownfield sites identified in the Local Area Plan.

A recent local newspaper article about the proposed digital hub on the Rialto cinema site quoted a local authority official saying "It had been planned for Stereame but that had been shot down by the Department as it was not town centre". The bias towards out-of-town development has worrying implications for the future sustainability of

the town and goes against many national, regional and county-level policies on consolidating our town centres and the principle of compact growth. I do not know what specific measure in the Local Area Plan could help counteract this bias, but perhaps it would be helpful to engage with local authority officials who view locations like Stereame as suitable for digital hubs and software development companies, to see what guidance would encourage them to site (and encourage others to site) such developments in the town centre. Certainly the descriptions of the Stereame and Lisbunny sites in the Local Area Plan leave the reader with the impression that the development of large-scale employment is not encouraged within the town centre (or in locations where employees could comfortably walk into town on their lunch break), notwithstanding the principle stated that new offices should have easy employee access.

A lot of land in Nenagh is given over to car parking, both on-street and off-street. I would like to propose a specific opportunity site in the Kenyon St car park. The car park already has recently-built commercial units at its far end, and replacing the car parking with a mixed housing/employment development, with additional permeability for active travel towards Silver St and Stafford St, would be a positive development for the town. Any need for more parking displaced by the closure of Kenyon St car park could be accommodate on sites further out of town.

Local Transport Plan

It is difficult to see the rationale for the "Nenagh Traffic Management Plan" which was submitted as a Section 38 development four months before the Local Transport Plan was released. No traffic modelling, road safety audit, or any other narrative document was made available with this traffic management plan, it was just a set of drawings. The Local Transport Plan just seems to accept the introduction of this plan, accompanied by a statement "Over the longer term horizon of the LTP, further enhancements to the proposed one-way system may be feasible through reallocation of road space for public realm upgrades and further provision for active modes", which is a relatively weak commitment compared to other measures proposed in the plan.

Furthermore, the aim of the Nenagh Traffic Management Plan is stated in the Transport Plan to "reduce congestion" which is another way of saying "increase capacity for the private car". I don't believe this is compatible with the national, regional and county-level commitments to reduce emissions and reduce dependency on the private car.

I would like to suggest a new measure to try and ensure that the redesign of this facility is encouraged as a priority:

ATx: Priority reallocation of road space on the new Nenagh Traffic Management Plan towards active modes to provide safe segregated routes for active travel users and to mitigate against the increased capacity for private cars being introduced in the town centre.

Active travel network

Aside from the severance in the town centre caused by the Nenagh Traffic Management Plan, I would like to welcome the active travel network proposed. If implemented over the period of the plan it would have a positive effect on the town, especially for the 1 in 5 households in Nenagh who do not own a car (Census 2016). Some of the visualisations in the Plan are excellent with bevelled entrance kerbs and no height change for pedestrians and cyclists crossing side entrances. It might be worth incorporating these design elements as a specific action for any new measures built, to avoid the usual 'dipping' of footpaths at side entrances and severance of cycle facilities at

junctions.

Public transport network

The transport plan does not propose to remove the town centre bus stops and I would like to welcome this measure. The narrative in local media from council meetings quoting local authority officials that I have read emphasised that buses were getting in the way of cars. I never saw any discussion reported on how more people can be encouraged to use public transport. I have reservations about the proposed mobility hub, in light of the above, but as long as buses are stopping in the middle of town where services are accessible to more people, some additional rail/bus integration may be helpful.

Roads

The proposed roads do not seem to meet the criteria for new roads outlined in the local transport plan. I could not see any specific mitigating measures being proposed that would counteract the induced demand for more traffic as a result of such schemes. I would support the HGV ban, although I do not see the building of additional roads as necessary to facilitate this ban.

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