

Nenagh Local Area Plan,
Planning Department,
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary,
E45 A099.

11th September 2023

Re: Draft Nenagh Local Area Plan 2024-2030

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the Draft *Nenagh Local Area Plan 2024-2030* ('Draft LAP') and associated Draft *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 Nenagh and, in particular, the manner in which Tipperary County Council has developed an evidence-based Local Transport Plan (LTP) to accompany the Draft LAP, 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 Nenagh 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 LAP provides a good basis for the future development of Nenagh 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 Nenagh, 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 (NSOs) included in the *National Planning Framework* (NPF), 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 objectives align in large measure with the recommendations of the LTP. 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.
- The LTP addressed a study area larger than the LAP area. With particular regard to the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes that accompanied the preparation of the Draft LAP, the NTA recommends that the final LAP should explicitly distinguish between the LTP measures that are within the LAP area, and those that fall outside its boundaries and thus outside the scope of the SEA and AA. This is particularly relevant in the case of Policy 6.2, which states that it is the policy of the Council to ‘Support the implementation of the active travel and demand measures identified in the Local Transport Plan (Appendix 2) and require proposals for new development to compliment and demonstrate how they will integrate with the provisions of the Local Transport Plan.’
- This need to distinguish between LTP measures within and outside the LAP boundary would also apply elsewhere in the Draft LAP. For example, in Section 4.2 Nenagh Strategic Employment Areas, which relates to sites at Lisbunny, Stereame and Gortlandroe, it is stated that ‘Active travel measures identified in the Draft LTP will improve accessibility by active modes to this area.’ However, the Draft LAP does not identify the relevant LTP active travel measures. In this regard, the inclusion of maps illustrating proposed active travel measures and relevant sites would assist in demonstrating how this improved accessibility by active modes would be achieved.

6.1 Active Travel, Movement and Accessibility

Section 6.2 of the LTP relates to Active Travel and includes a section on Safe Routes to School. As noted above, LAP Policy 6.2 does refer to the full suite of measures included in the LTP.

Notwithstanding the general recommendation above that Chapter 6 would benefit from the inclusion of greater detail on the proposed measures, **the NTA recommends** that a specific policy should be included in the LAP that supports and commits to the *Safe Routes to School* programme as managed by the NTA, in light of the volume of vehicular traffic generated by travel to schools and the importance of developing a culture of sustainable travel at a young age.

6.2 Public Transport

Transport Hub:

Objective 6D states that the Council will ‘Collaborate with the NTA, national and local bus service providers to consider how the bus service, infrastructure and facilities can be better tailored to the needs of the community, including for a consideration of the nature and location of public bus stops, and the provision of centrally located transport hub at the Rail Station.’ While the NTA is supportive in principle of the provision of better integration between bus and rail services, any improved

bus/rail facilities at Nenagh Railway Station should be planned to complement, but not replace, the location of the main bus stop in the heart of the town centre. In this regard, the NTA welcomes the statements in Objective 6D that the bus service should be 'tailored to the needs of the community' and that 'the nature and location of public bus stops' will be considered, independent of the provision of a transport hub.

A transport hub at the rail station would, if developed, give rise to trip-making on the approaches to the hub by the full range of modes, including walking, cycling, taxi and private car, as well as an increase in bus movements to and from the hub. The NTA noted this trip-generation during the development of the LTP and the likely impact of increased vehicular movements on active modes, and highlighted in particular the lack of a direct, high quality cycle link between the town centre and the proposed transport hub. The Draft LTP proposes traffic calming on Kenyon Street and segregated cycle facilities on Martyr's Road and Friar Street, although the latter proposal represents a detour from the desire line and would be unlikely to attract cyclists from the west of the town in particular. Furthermore, all approaches to the station appear to converge on the roundabout at the station entrance, which presents a hostile environment for cycling and walking. **The NTA therefore recommends** that the LAP and LTP should consider further the needs of pedestrians and cyclists on the approaches to the rail station, in particular at the roundabout adjacent to the station entrance, and that these matters should be resolved prior to the development of a transport hub at the station.

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.

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.

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.

6.4 Roads Strategy

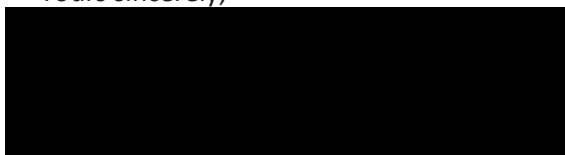
While the NTA acknowledges the constraints that currently pertain within Nenagh arising from the volume of non-local/strategic traffic in the town centre, the NTA would also emphasise the need for investment in any additional road capacity to be justified through a clear demonstration of the benefits arising from new road proposals 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.

In general, **it is recommended** that greater alignment is established between the roads proposals set out in the LTP/LAP and the goal of managing general vehicular capacity elsewhere, such that there is, at a minimum, no increase in general vehicular car capacity in the LAP area. **The NTA also recommends** that the LAP should include a policy stating that the implementation of active travel measures is not contingent on the completion of new roads schemes, and that the development of new/improved roads and delivery of active travel measures should happen in parallel. In the absence of such safeguards, there is a risk that roads proposals may proceed to construction without the commensurate (or greater) reduction in traffic capacity in the town centre, which would undermine or jeopardise the achievement of, *inter alia*, the NPF NSOs.

An overarching objective of the LTP is the removal of non-local and strategic trips by private car from the town centre through the implementation of active travel schemes and the development of a limited number of new road schemes. In May 2023, the Council adopted the *Nenagh Traffic Management Plan* (TMP), which was developed to address the traffic conditions in the town centre at the time of the preparation of the TMP. Should through-traffic be reduced or substantially removed from the town centre, **the NTA recommends** that there would be an opportunity for further road space reallocation to sustainable modes, public realm improvements or social uses, and that the provisions of the TMP may therefore merit re-examination.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Nenagh Local Area Plan and Local Transport Plan.

Yours sincerely,



Michael MacAree

Head of Strategic Planning