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

11th September 2023

Re: Draft Thurles Local Area Plan 2024-2030

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Draft Thurles 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 Thurles 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 Thurles 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 Thurles 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 Thurles, 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 LTP:

- 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 present 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 6.5.

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, Policy 6.5 & 6.6

While the NTA acknowledges the constraints that currently pertain within Thurles 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 could impact on 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. Should through-traffic be reduced or substantially removed from the town centre, **the NTA recommends that** consideration should be given to for further road space reallocation to sustainable modes and public realm improvements.

Content of Local Transport Plan (Appendix 2)

The NTA welcome the preparation and publication of the Draft Thurles 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 following 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 Active Travel

Main East-West Greenway – Orbital Connectivity

This greenway is presented as a key measure in providing a 'safe, segregated cycle link to a number of primary and secondary schools', facilitated by connecting permeability links between the greenway and schools. In assigning this central function to the greenway, the importance of your-round utility, safety and security on this route needs to be emphasised through, for example, the achievement of passive surveillance and street lighting. The ability to achieve a higher level of priority for cycling on the radial network should also be kept under review, coupled with the reduction in vehicular traffic, particularly on the approaches to the town centre.

6.4 Traffic Management Solutions

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, the functions of how parking, public transport, local traffic management, provision of walking / cycling and public realm improvements would be reconciled is of critical importance. 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.

6.5 Demand Management / Supporting Measures

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 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'.

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

Yours sincerely,



Michael MacAree
Head of Strategic Planning