

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

18th December 2023

Re: Draft Clonmel Local Area Plan 2024-2030 (Proposed Material Alterations)

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Proposed Material Alterations to the Draft Clonmel Local Area Plan 2024-2030* ('proposed material alterations') and associated *Local Transport Plan*. The inclusion of a number of Proposed Material Alterations arising from consideration of the NTA's submission on the Draft Local Area Plan is acknowledged and supported.

In relation to a number of these material alterations, the NTA makes the following further recommendations for the Council's consideration.

Proposed Amendment no. 31, 32, 33, 34, 35, 36, 38, 41-44

Whilst it is noted that additional cross referencing, as recommended, has now been included, between the LAP and the Local Transport Plan, the NTA would make the following comments and additional recommendations to provide for greater clarity and facility of use.

Comments and Recommendations

In order to further facilitate the practical use of the supporting LTP document, it is recommended that cross-referencing includes reference to specific chapters, sections, figures and tables, as applicable, across the main LTP report and supporting appendices.

In the case of Amendment no. 32 (Active Travel, Movement and Accessibility), whilst reference has been made to Appendix C of the LTP (Stage 2 Multi-Criteria Analysis) for 'the full list of all measures', the full list of measures is actually included in Table 6.2 (Active Travel Interventions) of the main LTP report. It is recommended that this is amended. Also, in the interest of consistency, this list could be

included in the LAP written statement as is the case for the LTPs Demand Management Interventions (see Proposed Amendment 34).

To facilitate access to and use of the LTP as a supporting document to the LAP, it is recommended that all relevant documents, presented on line, are accessible from the same web page. The four appendices to the LTP, which are referred to in some of the Amendments, are currently presented in a separate location to the main report under the category of 'Reference Material'.

Proposed Amendment 55, a new objective (objective xx) under Chapter 4 – Economic Development Strategy

It is noted that under Proposed Amendment 55, a new objective (objective xx) under Chapter 4 – Economic Development Strategy, provision is made (following completion of N24 Waterford to Cahir Scheme statutory process) for the investigation, 'in consultation with statutory agencies and stakeholders, options for the development of 'Employment' zoned lands north of the N24, identified as Site 2 on the Employment SLA ... within the context of a masterplan', with a masterplan providing for 'a coordinated approach to delivery and sequencing of development, road access, active travel and permeability'.

Recommendation

Firstly, it is recommended that this objective should relate to both sites 1 and 2, as two adjacent sites. Furthermore, given the extensive nature of these sites, their future master planning should be undertaken through a statutory process and in coordination with an associated review of the Local Transport Plan.

Proposed Amendments to the Appendix 2: Local Transport Plan (Amendment no. 70, DM9 Cycle Parking and DM10 Parking Standards)

Comment and Recommendation

It is proposed to add two new measures to the Demand Management table related to *Cycle Parking (DM9)* and *Parking Standards (DM10)*

Proposed measure DM18 states that 'reduced levels of parking [will be] sought in highly accessible locations with good access to services and public transport opportunities', and that 'Any proposal for reduced level of parking shall be accompanied by robust justification.'

Recommendation

While supportive in principle of both of these proposed additions, the NTA recommends that the Cycle Parking measure should be considered an Active Travel measure rather than a Demand Management measure.

The NTA recommends that the wording of DM10 should be revised to state that robust justification should be provided in cases where the *maximum* permitted quantum of parking is being proposed for development in highly accessible locations with good access to services and public transport opportunities, i.e. there should be a presumption in favour of reduced parking in such locations.

In this regard, the NTA would reiterate that 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

The NTA would reiterate the following recommendation made in its submission on the Draft LAP which do not appear to have been specifically addressed in the proposed amendments:

Table 2 (SLA for lands available for employment use)

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.

This matter is also addressed (in this submission) under Proposed Amendment no. 55, above, and can also be related to comments previously made on the Draft LTP under section 6.4 Road Network (Figure 6.21).

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 Mac Aree
Head of Strategic Planning