

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

18th December 2023

Re: Draft Nenagh Local Area Plan 2024-2030 – Material Alterations

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the proposed Material Alterations related to 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, the NTA submits the following observations and recommendations on the proposed Material Alterations for the Council's consideration.

Support for proposed Material Alterations

The inclusion of a number of proposed Material Alterations arising from consideration of the NTA's submission on the Draft LAP is acknowledged and supported. In particular, the NTA welcomes proposed Material Alterations as follows:

- 2:** Clarification that the SEA and AA relate to the Local Transport Plan proposals within the LAP boundary only;
- 21:** Additional text on Future Demand For Travel, and Options Development;
- 23:** Insertion of a table setting out key public transport interventions;
- 24:** Insertion of a table setting out key demand management interventions;
- 25:** Addition of a map showing the proposed new roads;
- 26:** Additional text on Implementation, which emphasises the 'upfront delivery of active travel and public transport measures, supported by a range of demand management measures encouraging sustainable travel behaviours';
- 27:** Amendment to Policy 6.2 to include reference to the active travel measures in Figure 6.11;

28: New Policy to Support the implementation of public transport measures identified in Table 6.4 of the Local Transport Plan;

29: New Policy to Support the implementation of demand management measures identified in Table 6.6 of the Local Transport Plan; and

The inclusion of a new Objective in the Local Transport Plan related to Cycle Parking.

In its submission on the Draft LAP, the NTA recommended the inclusion in the LAP of a specific policy regarding the *Safe Routes to Schools* programme. While such an objective is not proposed for inclusion in the draft Material Alterations, the NTA notes the proposed insertion into the final LAP of the table of Demand Management measures (ref. no.24 above), which includes measures DM3, DM4 and DM7, which relate to school travel and safer front-of-school environments.

Additional Recommendations

In relation to a number of these proposed Material Alterations, the NTA makes the following further recommendations for the Council's consideration:

Cross-referencing and Accessibility of Documents - Recommendations

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

Furthermore, to facilitate access to and use of the LTP as a supporting document to the LAP, it is recommended that all relevant documents, presented online, 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'.

Material Alteration no.21

The proposed new Section 6.1 related to Future Demand for Travel states that 'Any new residential or employment developments (including expansion of existing) in Nenagh will also need to provide active travel infrastructure throughout the proposed developments, which will connect to the proposed set of measures outlined in this LTP. This will ensure that connectivity across the network is maintained as Nenagh is developed into the future.'

Comment and Recommendation

The NTA is supportive of the provision, within future development sites, of active travel infrastructure that would connect to the town's active travel network. However, the development of these sites has the potential to enable the development of adjacent undeveloped lands at a future date, subject to zoning. The NTA therefore recommends that the wording of this proposed Material Alteration would merit further consideration, with a view to ensuring not only that connections are provided to the active travel network as currently proposed, but also that future active travel connections to adjacent lands are provided for and not precluded. Such revised wording would ensure that the development of these sites would provide for through-trips across the sites by active

modes in due course, which would facilitate the expansion of the wider active travel network through the development of future LTPs and LAPs.

Material Alteration no.24

It is proposed to add two new measures to the Demand Management table related to *Cycle Parking (DM10)* and *Parking Standards (DM11)*.

Proposed measure DM11 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 DM11 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 recommends 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 respectfully requests that the foregoing observations are taken into consideration by the Council prior to the finalisation of the Nenagh Local Area Plan 2024-2030.

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning