

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

18th December 2023

Re: Draft Thurles 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 Thurles 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. 20, 22, 23, 24, 25, 26, 27, 28

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. 22 (Active Travel), 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 6.3 (Active Travel Interventions) of the main LTP report. It is recommended that this is clarified. Also, in the interests 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 24) and LTP Road Interventions (Proposed Amendment 26).

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'.

4.0 Elected Members Proposed Amendments to Written Statement EM1

This new objective, supports 'the provision of car parking spaces in suitable locations within the town including pocket carparks and multi-storey carparks as appropriate', 'to ensure the LAP supports the continued growth and development of Thurles' established sporting tradition'.

Comment and Recommendation

It is not clear how this new objective relates to the provision and management of parking, as a key aspect of transport demand management, within the LAP area as a whole. The NTA would place a critical emphasis on the importance of parking at destination as a key influencing factor of mode choice, through the management of car parking in the town centre and other locations.

If the proposed amendment is intended to relate specifically to event day parking for sporting events, this need to be clarified further, with reference to specific location(s) and associated measures.

Proposed Amendments to the Appendix 2: Local Transport Plan (Amendment no. 52, DM17 Cycle Parking and DM18 Parking Standards)

It is proposed to add two new measures to the Demand Management table related to *Cycle Parking (DM17) and Parking Standards (DM18)*

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 DM18 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 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