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

9th December 2024

Re. Draft Carrick-on-Suir Local Area Plan 2025-2031

Dear Sir/Madam,

The National Transport Authority (the “NTA”) has reviewed the Draft Carrick-on-Suir Local Area Plan and associated Sustainable 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 consideration of the Council.

Appendix 2: Sustainable Transport Plan

The NTA welcomes the preparation of a Sustainable Transport Plan (STP) as part of the Draft Local Area Plan (LAP). In particular, the NTA acknowledges the detailed level of baseline analysis undertaken to inform the emerging policies and objectives.

4.0 Mode Share Targets

The STP states that the mode share targets for Carrick-on-Suir ‘are based on the mode share targets for Tipperary as a whole, which should be seen as absolute minimum targets for Carrick-on-Suir given its urban profile and the strong potential for local trips [...] to be undertaken in large proportion, by walking and cycling and through use of public transport.’ (p.31)

The NTA is supportive of the inclusion of Mode Share Targets in the STP, particularly where such targets are higher than the county targets and are stated as minima, i.e. mode shift would be expected to surpass these targets within the lifetime of the plan.

5.0 Sustainable Travel Actions

The NTA is supportive of the Key Objectives for Walking, Cycling and Public Transport set out in Table 5.1. These objectives provide a robust basis for the proposed active travel and public transport measures outlined in Table 5.3. The NTA also welcomes the support for its Cycle Connects and Connecting Ireland programmes in Section 5.1. However, while Connecting Ireland is explicitly included in the list of Key Objectives for public transport, the NTA notes that alignment with Cycle Connects has not been referenced as a Key Objective for Cycling and recommends that such reference should be included in Table 5.1.

5.3 Sustainable Transport Measures

Table 5.2 and the accompanying map 'set out a non-exhaustive list of actions that may be delivered subject to receipt of funding through the NTA's Active Travel Investment Programme and other investment programmes...' (p.41). While the NTA is supportive of the suite of measures proposed, it is not clear how a 'non-exhaustive list' can be transposed into the Draft LAP, or how such a list has been assessed from an SEA perspective. Such assessments should be carried out on a comprehensive list of schemes, rather than on partial lists that are subject to potential revision in future.

The town centre street network is currently characterised by a number of one-way streets. Where it is proposed to retain such streets, and particularly where it is proposed to invest in public realm enhancements on these streets, consideration must be given to providing for contra-flow cycling in order to minimise detours for active travel. This would provide a competitive advantage to active modes in the town centre, in accordance with the Modal Hierarchy set out in the National Sustainable Mobility Policy. For example, Figure 20 (p.46) shows a photomontage of 'Public Realm and Mobility improvements Proposed for Main Street', but it would appear that the proposed scheme provides for with-flow cycling in a one-way traffic regime only, with no facilities for contra-flow cycling.

The measures contained in the Carrick-on-Suir Regeneration Plan also form part of the suite of sustainable transport schemes in Table 5.2. While broadly supportive of these proposals, the NTA would query the intention to revise the traffic management at the junction of Main Street and Dillon Bridge by replacing a signal-controlled junction with a priority-controlled junction. It is stated that 'Pedestrian movement will be prioritised by the design' (p.39), but it is not clear how such a measure would accord with the principles of Universal Design and the requirement to ensure accessibility for all. As such, the NTA recommends that this proposal may merit further consideration.

Recommendations:

The NTA recommends that the planning authority consider the following proposed revisions to chapter 5 of the STP:

- Include specific reference to the NTA's Cycle Connects programme under the Key Objectives for Cycling in Table 5.1;
- Reconsider the 'non-exhaustive' extent of the suite of proposed sustainable transport measures in Table 5.2 (and Table 11 in the LAP – see below), particularly in light of the requirements of the SEA process;
- Consider the impacts of the one-way traffic system on active travel and examine the potential for contra-flow cycling, particularly in the town centre; and
- Reconsider the objective to revise the Main Street-Dillon Bridge junction by the removal of traffic signals, informed by the need to accord with the principles of Universal Design.

Access To Opportunities and Services (ATOS)

The baseline assessment in the STP outlined a number of key issues to be addressed through the LAP and STP development. However, the NTA notes that this assessment did not include a baseline accessibility analysis using the NTA's ATOS tool. This analysis could not only have facilitated comparison between accessibility in the baseline and horizon-year scenarios; it could also have assisted in establishing a correlation between accessibility, trip patterns and trip length distribution.

Furthermore, ATOS analysis can inform the identification of Development Objectives and associated Transport Measures, which would be undertaken in an iterative manner so as to optimise the sustainable development outcomes. In this way, the LAP and associated STP could clearly demonstrate how identified sustainable transport measures contribute to the objectives of:

- development consolidation;
- the maximisation of accessibility to key destinations within the town by walking and cycling;
- reduction in the need for car use for local trip-making;
- management of the car at destination;
- facilitating the efficient operation bus services into and through the town; and
- the provision of appropriately located and designed bus set down facilities at key locations within town.

Recommendation:

The NTA recommends that a Baseline and a Horizon Year ATOS assessment should be carried out and the outputs included in the final STP. This would provide a basis for assessing the effectiveness of the measures proposed in the STP.

LAP Written Statement - 6.0 Transport and Connectivity

6.3 Sustainable Transport Plan

Table 5.2 in the STP is included in the Draft LAP as Table 11, which sets out 'a non-exhaustive list of works for which funding will be sought by the Council over the lifetime of the LAP'. While supportive of the explicit inclusion of a list of proposed schemes in the Draft LAP, the NTA would query the 'non-exhaustive' aspect of this list, particularly regarding the assessment of schemes from an SEA perspective.

6.4 Roads Strategy

6.4.1 Urban Vehicular Connectivity

The Draft LAP supports 'the development of a third river crossing, subject to the identification of a need for such transport-related infrastructure' (p.61), in accordance with the objectives of the *Carrick-on-Suir Town Development Plan 2013* and the *Waterford City and County Development Plan 2022-2028*. Should such a need be identified, the NTA recommends that any feasibility study should include the examination of the potential for road space reallocation in the town centre, including the potential for the Old Bridge to be converted to a sustainable transport bridge, i.e. to remove the bridge from the private car traffic network. This would accord with the cycle network proposed in the STP and with the NTA's Cycle Connects network for the town (Figure 17 in STP).

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, 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 Intervention Hierarchy contained in the National Investment Framework for Transport in Ireland, which requires consideration of proposals in the following sequence: 1. Maintain, 2. Optimise, 3. Improve and 4. New.

6.6 Policy and Objectives

Aside from the inclusion of Table 11 in the LAP, which transposes fully Table 5.2 of the STP, the proposals in the STP are addressed at a policy level in the LAP only in Policy 6.2. While the NTA supports the preparation of the STP for the town, as noted above, the manner in which the STP proposals are included in the Draft LAP would merit further consideration, given the statutory nature of the final LAP. In this regard, the NTA would welcome the inclusion in the LAP of specific policies in support of Cycle Connects, Connecting Ireland and Local Link.

In light of the comments above regarding the development of a new western river crossing, the NTA submits that the wording of Policy 6.6 should be reviewed, such that it would provide for an examination of road space reallocation and the potential conversion of Old Bridge to sustainable transport uses only.

Recommendations:

The NTA recommends that specific policy support for Cycle Connects, Connecting Ireland and Local Link should be included in the Planning and Development Policy Table in Section 6.6. The NTA also recommends that the wording of Policy 6.6 should be reviewed, to provide for an examination of road space reallocation and the potential conversion of Old Bridge to sustainable transport uses only.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Carrick-on-Suir Local Area Plan.

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning