

**Kenneally, Elaine**

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**From:** Tipperary County Council - Consultation Portal <socialmedia@tipperarycoco.ie>  
**Sent:** 31 March 2025 15:43  
**To:** Planning Policy  
**Subject:** Webform submission from: Draft Carrick-on-Suir Local Area Plan 2025-2031  
Proposed Material Alterations

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Submission ID: DCOSLAP--14

Submitted on Mon, 31/03/2025 - 15:43

Submitted by: Anonymous

Submitted values are:

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**Comments**

Please see submission from the NTA attached.



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31<sup>st</sup> March 2025

**Re: Carrick on Suir Local Area Plan 2025-2031 – Proposed Material Alterations**

Dear Sir/Madam,

The National Transport Authority ('the NTA') has reviewed the *Chief Executive Report* (CE Report) and the proposed Material Alterations to the *Carrick on Suir Local Area Plan 2025-2031* (LAP) and submits the following observations and recommendations for the consideration of the planning authority. The NTA acknowledges the consideration given to its recommendations on the Draft LAP as set out in the CE Report and welcomes the amendments proposed on foot of these recommendations.

#### **Material Alteration 9 (EM2)**

The subject Material Alteration (MA) proposes to add a new Objective 3H to Section 3.7 regarding dereliction and regeneration. The NTA is supportive of the intention to facilitate the reuse and regeneration of derelict buildings for retail, commercial, residential and other mixed uses. Such uses would accord with the Town Centre First policy, would support compact growth of the town, and would facilitate the use of sustainable transport modes for a range of trip purposes.

However, the NTA notes the further proposed amendment (green text) which would include 'other strategic purposes, including car parking' within the range of acceptable uses of derelict buildings. The NTA does not support this proposed amendment, given its potential to undermine the objectives of the Sustainable Transport Plan and the Town Centre First policy, and recommends that the additional amendments should be omitted from the final Objective 3H, if approved.

#### **Recommendation:**

The NTA recommends that Objective 3H, if approved, should omit reference to car parking as an acceptable use for derelict buildings in the town centre.

### **Material Alteration 10 (EM3)**

MA10 proposes to amend Objective 3G, which relates to coach parking, by the inclusion of a reference to tourism purposes. Proposed MA EM3 provides additional detail in this regard, by expanding the range of parking addressed by Objective 3G, identifying potential locations for additional parking and including not just tourism purposes but also the needs of businesses and traders.

No rationale has been provided in support of the EM3 proposals, which would extend the scope of Objective 3G beyond tourism considerations, and the NTA submits that such proposals should be examined in the context of the Sustainable Transport Plan and, potentially, a Parking Plan for the whole town. The NTA is therefore not supportive of the EM3 element of MA10, but would support the original MA10 without the additional EM3 proposals.

#### **Recommendation:**

The NTA recommends that MA10, if approved, should revert to the original proposed text and should omit the additional EM3 proposals.

### **Material Alteration 12 (EM4)**

MA12 proposes to amend Section 4.2.2 of the Draft LAP by the inclusion of principles to guide the development of lands zoned for Employment use. A further suggested amendment (EM4) proposes to remove the requirement to provide active travel infrastructure and connections, and to replace it with an intention to consider active travel infrastructure 'where possible'. In light of the national and regional policy context, including the Modal Hierarchy outlined in the *National Investment Framework for Transport in Ireland*, and the Mode Share targets contained in the Sustainable Transport Plan, the NTA is supportive of the original wording of MA12 including the requirement to provide active travel infrastructure, and is not supportive of the EM4 revision to the proposed MA.

#### **Recommendation:**

The NTA recommends that MA12, if approved, should omit the caveat 'wherever possible' and should include the provision of active travel infrastructure as a requirement, as initially proposed in MA12.

### **Material Alteration 24 (EM10)**

MA24 proposes to amend Objective 5H regarding the development of additional recreational and amenity spaces in the town. While the NTA has no issue with the identification of specific locations, the proposal that associated car parking should be developed in tandem represents a departure from the focus of the Objective and, as with MA10/EM3 above, appears to have been proposed without reference to the Sustainable Transport Plan. The NTA is therefore not

supportive of the inclusion of the phrase 'and associated car parking', but is otherwise supportive of this proposed amendment.

Recommendation:

The NTA recommends that MA24, if approved, should omit the reference to car parking.

**Material Alteration EM13**

MA EM13 proposes to amend Section 6.6 by the inclusion of a new Objective 6K, which would 'Investigate the feasibility of delivery a new vehicular street to the south of the Ormond Castle linking the Pill Road to the Town Centre.' In its work with other local authorities on the preparation of Local Transport Plans, the NTA has had a consistent position on proposals for new roads. Where such roads only provide access to development lands, the NTA is generally supportive in principle. Where new roads increase the overall capacity of the road network at a local or a strategic level, the NTA does not support such proposals.

The subject MA EM13 would appear to fall into this latter category, i.e. to be intended to relieve traffic congestion within the town and to increase overall road network capacity. This does not accord with the Modal Hierarchy and Intervention Hierarchy set out in NIFTI. Furthermore, the NTA submits that new road proposals would be best considered in the context of a multi-modal Local Transport Plan or Sustainable Transport Plan, rather than as standalone proposals in an LAP. The NTA therefore does not support proposed MA EM13 and submits that it should not be included in the LAP as adopted.

Recommendation:

The NTA recommends that MA EM13 should be omitted in its entirety from the final adopted LAP.

I trust that the views of the NTA will be considered in the assessment of the proposed Material Alterations and in the finalisation of the Local Area Plan.

Yours sincerely,



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**Michael MacAree**  
**Head of Strategic Planning**

