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3rd February 2023

Re: Draft Edenderry Local Area Plan

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft Edenderry Local Area Plan and submits the following observations and recommendations for consideration.

1.   General Comments

The NTA is supportive in principle of the approach being taken to the development of Edenderry and, in particular, the manner in which Offaly County Council has developed an evidence-based Local Transport Plan to accompany the Draft Local Area Plan, setting out a framework for transport investment in the settlement. There are a number of recommendations set out below which, in the view of the NTA would serve to strengthen the integration of transport planning and land use planning in Edenderry and foster greater potential for sustainable transport use. There are also a number of recommendations which seek to provide greater clarity on some detailed matters. Overall, however, the NTA is of the view that the Draft Local Area Plan provides a firm basis for the sustainable development of Edenderry over the coming years.

2.   Zoning for Enterprise and Employment

The NTA notes the limited extent of additional zoning for any land uses undertaken in the making of the Draft Local Area Plan relative to the 2017 Plan. This is welcome as evidence of an approach being taken which seeks to consolidate development within the settlement. It is clear, however, that there is a significant quantum of undeveloped land zoned for Enterprise and Employment across a large number of discontinuous sites throughout the area within the defined settlement boundary. The rationale for such an extent of zoning is not presented in the Local Area Plan in terms of its function, i.e., whether it is intended to serve a local or strategic employment generating function. By virtue of its scale and location, it appears that there is potential for the development of these lands to lead to a significant amount of car-based commuting into Edenderry from other settlements.

NTA Recommendation

The NTA recommends that the extent of zoning for Enterprise and Employment is reviewed and a clear rationale, in economic, spatial and sustainable transport terms, is set out for the retention of any sites brought forward into the final Local Area Plan.

3.   Town Centre and Regeneration

The NTA is broadly supportive of the policies and objectives of the Draft Local Area Plan which seek to focus development into Edenderry Town Centre. Objective TCO-01 could, however, be strengthened by the inclusion of sustainable transport as a consideration in the assessment of retail development.

NTA Recommendation

The NTA recommends that Objective TCO-01 is amended to read as follows:

> *Assess retail development outside the Core Retail Areas of Edenderry in accordance with Town Centre First principles, the Offaly County Development Plan, Chapter 4 'Retailing and Development Management' of the Retail Planning Guidelines (DECLG, 2012), and the manner in which the development meets sustainable transport objectives.*

4.   Mode Share Targets

As stated above, the NTA welcome the extent to which Offaly County Council have made use of Census data in first, providing an evidence base from which to determine policy, and secondly, deriving targets for the Local Area Plan. The mode share figures presented, however, do not appear to be complete, in particular for education trips. For example, in Table 9.1 neither the total for 2016 Baseline nor for the Minimum Ambition add up to 100%. It is also noted that children of primary-school age do not appear to have been considered. The effect of this is to lead to a lack of clarity in terms of the direct link between the base data and the targets.

NTA Recommendation

The NTA recommends that Offaly County Council review the mode split data presented in the draft plan with a view to providing greater clarity.

5.   Critical Infrastructure Objectives

The NTA note the emphasis on sustainable transport evident in Chapter 9 and the manner in which a potential bypass and inner relief roads are given expression in the plan. There is some concern, however, that Objective CIO-6 serves to limit potential roadspace reallocation in Edenderry by tying it directly to the provision of additional compensatory roadspace. Such an approach is inconsistent with the National Sustainable Mobility Policy which supports roadspace reallocation without reference to providing relief roads or alternative routes. The approach set out in CIO-6 would likely have the opposite effect to that intended by sustainable transport policy by providing significant investment in high-quality, unconstrained higher-capacity new road infrastructure around Edenderry while

reallocating short stretches of constrained lower-capacity inner streets to sustainable modes. This would increase roadspace for the private car and compound car dependency in the town.

NTA Recommendation

The NTA recommends the deletion from Objective CIO-06 of the text shown in strikethrough below:

> *To reallocate corresponding roadspace within Edenderry to walking, cycling and public transport* ~~*to accompany / occur concurrently with the provision of additional roadspace capacity under CIO-05*~~. *This may take the form of removing traffic from streets, removing lanes of traffic, narrowing carriageways, traffic management measures, or removing on-street parking to provide cycle tracks or widened footpaths.*

6.   Content of Local Transport Plan

The NTA welcome the development and publication of the Edenderry Local Transport Plan (LTP), in broad accordance with NTA/TII Guidance, based on empirical evidence and on an ambitious approach to investment in walking, cycling and public transport. In order for this LTP to provide a comprehensive framework for investment in sustainable transport, the following are recommended:

- The first objective of the LTP over-emphasises congestion as a driver of transport planning and suggests a solution at the outset which should not form part of an objective. As such, this text should be removed and replaced with the following:
    o   Reduce the impact of congestion;

- Similarly, the solution part of the second objective "through traffic calming measures" should be removed. There are many approaches for improving road safety for vulnerable road users (traffic reduction, new crossings, improved cycle infrastructure etc.) and to highlight one above others, in particular as an objective, is inappropriate;

- The third objective should be reviewed in a similar manner, as roadspace reallocation is a specific measure which is covered under the 4th, 5th and 6th objectives;

- A map of all of the options should be provided;

- Section 1.2.7 refers to the Draft National Cycle Network (NCN) as published by the NTA having been further developed during the preparation of the LTP. A comparison of the LTP and NCN, in text or map form, would be a useful addition to the LTP;

- The LTP should include full network maps for each mode with the text list of LTP proposals;

- The proposed infrastructure map would benefit from being annotated with the code given to each measure in the text;

- Reference to consultation with the NTA should be included in PP1 – Enhancement of Existing Bus Stops on JKL Street; and

- Clarity on the Inner/Outer Relief route (as per map in Appendix B) and RP1 (as per text) is required. The definition of these routes is unclear, in particular the route to the west of the town, which appears in the map but not in the text. This is of increased importance in the context of Objective CIO-6 referenced above.

I trust that the views of the NTA will be taken into consideration in the finalisation of the Edenderry Local Area Plan, and we are available to discuss any issues arising from the comments made.

Yours sincerely,

Michael Mac Aree

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Michael Mac Aree
Head of Strategic Planning