

Administrative Officer
Draft County Development Plan
Forward Planning Unit
Longford County Council

by e.mail; cdp@longfordcoco.ie

Dáta | Date
12 January, 2021

Ár dTag | Our Ref.
TII20-111562

Re. Draft Longford County Development Plan 2021-2027

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on the Draft Longford County Development Plan, 2021 – 2027, and the opportunity to comment on emerging policies and development objectives scheduled in the Draft Plan.

TII's observations, provided in the following submission, seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory function and the provisions of official policy. To that effect TII provides the following comments for the Council's consideration.

1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

As outlined in observations made by TII in relation to the County Development Plan pre-draft consultation stage, the Trans-European Transport Networks (EU TEN-T) are a planned set of transport networks across Europe. The Regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The EU TEN-T Regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport co-ordinated to achieve integrated and intermodal long-distance travel routes across Europe.

The N4 and N5 national primary road corridors through Longford are identified as part of the TEN-T Comprehensive Network. In addition, the N55 and N63, national secondary roads, provide important regional and inter-regional connectivity within and through the Midlands.

Together the EU TEN-T Network and the national roads identified provide important strategic links within and through the county and region, including providing critical international connectivity.

Specifically, in relation to the EU TEN-T Network, Section 8.3 'Working Together for Economic Advantage' of the **National Planning Framework (NPF)** advises that there will be a focus on improving and protecting key transport corridors, including the TEN-T Network by, inter alia;

- *Improving and protecting the key transport corridors such as the TEN-T network and strategic function of the Dublin to Belfast road network from unnecessary development and sprawl.*

In addition, the Eastern and Midland Regional Assembly (EMRA) **Regional Spatial and Economic Strategy (RSES)** includes Regional Policy Objective 'RPO 8.11' which outlines the objective to support the improvement, and protection, of the EU TEN-T network as well as the strategic function of other specific road corridors.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.

These designations highlight the strategic importance of the national road network and the international dimension provided by airport and port access. This has obvious repercussions and action requirements for policies and objectives to be reflected in the County Development Plan.

The critical need to manage national road assets in accordance with national policy is outlined in the **Strategic Investment Framework For Land Transport** (DTTaS, 2014), **Smarter Travel** (DTTaS, 2009) and the provisions of the **Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’** (DoECLG, 2012).

In addition, the **National Planning Framework** identifies maintaining the strategic capacity and safety of the national roads network as part of National Strategic Outcome 2. The **National Development Plan** outlines as an investment priority, ensuring that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility and connectivity to transport users.

The Council will also be aware that the **EMRA RSES** includes Guiding Principles for Integration of Land Use and Transport. One of the guiding principles explicitly requires that the strategic transport function of national roads and associated junctions should be maintained and protected.

TII acknowledges that Section 5.2.3 of the Draft Plan confirms that the Council is aware of the vital importance of National Routes and Government policy to maintain, protect and improve the strategic function of the key transport corridors. As the Development Plan Core Strategy is required to identify relevant roads classified as national roads (national primary or secondary), TII would also welcome the Core Strategy reflecting the vital importance of the strategic national road network identified in Section 5.2.3.

Recommendation

- TII would welcome Chapter 4 Core, Settlement and Housing Strategies identifying the critical strategic national road links within and through the County and to acknowledge the strategic function of the network in facilitating the movement of strategic traffic, including freight and access for goods to market, including onward connection to international gateways, including the main national port and airport locations.
- TII would welcome consideration by the Council of including as a Core Strategy Objective in Chapter 4, Section 4.6, of the Draft Development Plan strategic objectives to reflect the foregoing policy requirements, which are summarised as;
 - to maintain the strategic function, capacity and safety of the national roads network, and
 - to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.
- TII notes that local area planning for Longford Town, identified as a Key Town in the EMRA RSES, is deferred to future local area planning; Core Strategy Objective CPO 4.8 refers. TII would welcome consultation on the Longford Local Area Plan process having regard to the significant national road interactions that exist.
- The Draft Plan also includes the commitment to undertake a Local Transport Plan for Longford in conjunction with the NTA and other stakeholders; Objective CPO 4.8 and Objective CPO 5.9 refer. TII welcomes that the preparation of a Local Transport Plan will inform the preparation of a Local Area Plan for Longford and therefore be prepared in advance of the Local Area Plan process. TII would welcome consultation on the preparation of the Local Transport Plan where there may be implications for the strategic national road network in the area.

Within the above strategic context, the Authority requests that the following specific observations and recommendations are considered for inclusion in the Development Plan prior to formal adoption.

2. SECTION 28 GUIDANCE: SPATIAL PLANNING AND NATIONAL ROADS GUIDELINES

2.1 Access to National Roads

Section 5.2.2 outlines that the Draft Plan promotes an integrated approach to land use and transportation, supports the creation of compact urban growth, consolidation of existing settlements and prioritisation of the development of brownfield lands. TII welcomes these principles informing the Draft Plan development strategy.

Objective CPO 5.17 of the Draft Plan outlines policy on access to national roads. TII welcomes that the Objective includes reference that development on strategic national roads will be carefully considered in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012).

Having reviewed Objective CPO 5.17, TII is of the opinion that the proposed objective should be reviewed to more closely align with the relevant text of Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines which states;

The policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 kmh apply. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.

It is noted that the proposed objective (Objective CPO 5.17) includes reference to ‘discourage intensification’ of existing accesses and development on national routes. TII respectfully suggests consideration is given to reviewing the text of proposed Objective CPO 5.17 as the approach outlined is not considered to comply with the provisions of the DoECLG Guidelines. TII outlines the following text for the Councils consideration;

Objective CPO 5.17

*‘Protect routes of strategic importance within the County, as outlined below, from further access creation and **discourage** intensification of existing accesses and development on national routes. Development on the National and Regional Routes outlined below shall be carefully considered to preserve their strategic role and safeguard the strategic function of the national road network, in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012)...’.*

It is noted that the Draft Plan contains no proposals for ‘exceptional circumstances’ in accordance with Section 2.6 of the DoECLG Guidelines. However, TII remains available to assist the Council in the development of proposals for consideration as ‘exceptional circumstances’ cases in accordance with the provisions of the DoECLG Guidelines.

Recommendation

- TII requests consideration is given to reviewing the text of proposed Objective CPO 5.17 as outlined in the foregoing;

Objective CPO 5.17

*‘Protect routes of strategic importance within the County, as outlined below, from further access creation and **discourage** intensification of existing accesses and development on national routes. Development on the National and Regional Routes outlined below shall be carefully considered to preserve their strategic role and safeguard the strategic function of the national road network, in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012)...’.*

- TII is available to assist the Council in the development of proposals for consideration as ‘exceptional circumstances’ cases in accordance with the provisions of the DoECLG Guidelines.

2.2 Economic Development including Retailing and Rural Development

a) Retailing

TII acknowledges the support for concentrating retail uses in established town centres and the application of the sequential test included in Section 8.7.2 of the Draft Plan, Objective CPO 8.56 also refers.

In the interests of clarity, TII would welcome a new policy objective included in the Development Plan to reference the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.

b) Rural Development

It is noted that a number of policies associated with economic and rural development understandably also seek to facilitate enterprise and employment proposals including retailing to a limited extent in a rural environment. Chapter 8 of the Draft Plan sets out the Councils Economic Development policies and objectives. Section 8.7.1.5 in particular considers Rural Areas. Chapter 9 addresses the Rural Economy.

TII acknowledges and supports the need to sustain rural communities.

TII would welcome inclusion, in the Draft Plan, in the interests of clarification and as an advisory to potential applicants for development in rural areas, of the requirement to adhere to the provisions of official policy in relation to development accessing national roads. It is considered that including such a reference in the text associated with Section 9.3.1 Rural Enterprise and Economy and as an associated Objective would be beneficial and would encapsulate all subsequent sections, including, Agriculture, Forestry, Horticulture, Equine Industry, Renewable Energy, Extractive industries and Rural Tourism (including associated objectives in section 10.5.3 and Development Management Standards in Chapter 16).

Reference to the provisions of official policy concerning development management and access to national roads and an appropriate cross reference with Objective CPO 5.17 of the Draft Plan would be welcome. It is considered important that there is early assistance to applicants in the preparation of any subsequent planning application where there may be implications for the strategic national road network in the area.

Consideration of an appropriate cross reference between Objective CPO 5.17 with Rural Housing Policy included in Section 4.8.11 should also be considered in the context of providing additional guidance to applicants/developers and in the interest of clarity.

Recommendation

- TII would welcome a new policy objective included in the Development Plan to include the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.
- It is considered critical that the policies and objectives included in the Development Plan relating to safeguarding the strategic function and safety of national roads are aligned with Government policy. Therefore, TII reiterates its recommendation that Objective CPO 5.17 is reviewed to ensure consistency with official policy.
- Having regard to the location and potential nature of developments facilitated by policies promoting rural enterprise and economic development, TII requests that an appropriate cross reference with policies included in Chapter 5 relating to access to national roads is included as a Policy Objective in Chapters 8 and 9 in the Development Plan prior to adoption.

Such an approach would assist in safeguarding the safety and operation of the national road network and would provide clarity for future applicants/developments in relation to development proposals relating to Agriculture, Forestry, Horticulture, Equine Industry, Renewable Energy, Extractive industries and Rural Tourism, etc. and associated Development Management Sections.

2.3 Development at National Road Junctions

The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities require that planning authorities exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

Recommendation

- Proposals for development and land use zoning designations at national road interchanges and junctions should be considered and be prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines. TII would welcome a new specific policy included in the Draft Plan Chapter 5 outlining the specific policy requirement to safeguard the strategic capacity of national road junctions in accordance with the provisions of official policy.
- It will be particularly important to consider the above in the context of the preparation of the Longford Local Area Plan. It is welcome that the Draft Plan confirms that a Local Transport Plan will be undertaken for Longford and that it will inform the local area plan. As indicated above, TII would welcome consultation on the preparation of the proposed local area plan and local transport plan.

3. TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

3.1 National Road Schemes

As you are aware the Authority, in collaboration with the Council, is developing/progressing road schemes and improvements within County Longford in accordance with National Development Plan investment commitments, including the following scheme;

- **N5 Ballaghaderreen to Scramogue**

The following scheme is also included as a Scheme at Pre-Appraisal/Early Planning in Project Ireland 2040 | National Development Plan, 2018 – 2027;

- **N4 Mullingar to Longford**

TII welcomes that the NDP Schemes identified above are included in Objective CPO 5.16 of the Draft Plan. The Council could consider using the same scheme citation used in the National Development Plan, in the interests of consistency.

Also, it is noted that the N5 Ballaghaderreen to Scramogue Scheme has not been included in Table 5.1 'Programme of Road Improvements 2021 – 2027', the reason for the omission of the scheme is unclear.

It is a concern that the text relating to the development of the national road schemes outlines a specific project process (Corridor and Route Selection Process) included in Objective CPO 5.15 of the Draft Plan.

All national road projects are required to be progressed in accordance with statutory processes and TII Publications, including the Project Management Guidelines and Project Appraisal Guidelines. TII requests that the Council give careful consideration to the decision to include the requirement to apply Objective CPO 5.15 'Corridor and Route Selection Process' to National Development Plan National Road Schemes in order to avoid any unintended consequences and to avoid any ambiguity in relation to the delivery of the National Development Plan National Road Schemes.

In the interests of clarity, TII would not support the additional requirements of Objective CPO 5.15 of the Draft Plan relating to 'Corridor and Route Selection Process' in addition to processes already applied to national road scheme planning. TII would welcome clarification of this matter in both Objective CPO 5.15 and Objective CPO 5.16 of the Draft Plan.

The Council will be aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the relative priority or timeframe for national road schemes may be subject to alteration.

TII acknowledges that Objective CPO 5.16 of the Draft Plan outlines the policy of the Council to reserve lands on proposed route corridors for identified national road schemes. It is considered critical that corridors for national road schemes are safeguarded pending the delivery of any scheme; Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines refers.

TII respectfully suggests that consideration should be given to protecting schemes as they progress through constraints study areas, route selection, emerging preferred routes and preferred/proposed routes, etc. TII strongly recommends that consideration should be given to incorporating a specific Policy Objective in accordance with the proposed wording outlined below or similar to conform to the provisions official policy;

Proposed Policy Objective; To protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery.

Exchequer investment has been, and is planned to be, directed to the development of the National Development Plan road schemes concerned. TII considers that inclusion of the above proposed Policy Objective would assist in safeguarding the investment made and being made.

The Authority's priorities in relation to national roads in County Longford, including the above Major Schemes, also includes the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date.

The Authority notes the inclusion of additional schemes relating to national roads outlined in Objective CPO 5.16 (and Table 5.1) of the Draft Plan which are in addition to the schemes included in the National Development Plan, identified above. While such additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements.

Proposals should be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII. This position also relates to road improvement proposals, bypasses, etc. included in individual settlement plans included in Volume 2 of the Draft Plan.

Recommendation

- It is the opinion of TII that the proposed text amendments identified in the foregoing should be incorporated into the Development Plan prior to adoption in the interests of adhering to the provisions of official policy identified in the Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), and Project Ireland 2040 National Planning Framework and National Development Plan, 2018 – 2027, objectives.
- TII recommends a consistent approach to national road scheme referencing to reflect citation included in the National Development Plan, 2018 – 2027.
- TII strongly recommends that consideration should be given to incorporating a specific Objective in accordance with the proposed wording outlined below or similar to conform to the provisions official policy and safeguard national road schemes in planning;

Proposed Policy Objective; 'To protect the study area, route corridor options and thereafter the preferred route corridor selected for the national road schemes being progressed in the Development Plan in accordance with National Development Plan Objectives and to prohibit development that could prejudice their future delivery'.

- TII would welcome clarification in the Draft Plan relating to the proposed application of Objective CPO 5.15 to national road schemes in the interests of avoiding risk to proposed national road schemes, in the interests of clarity and in the interests of adherence to the provisions of official policy. Associated Objective CPO 5.16 and text associated with the N4 and N5 National Development Plan national road schemes should also be reviewed.

4. OTHER TRANSPORT PROPOSALS

4.1 Objective CPO 5.59 and Action A5.7; Cycling Infrastructure

Objective CPO 5.59 outlines the commitment to provide cycling infrastructure to/from Longford Town along the N63 (Ballinalee Road), while this appears to be an urban proposal, this is not specified. In addition, Action A5.7

outlines the commitment to prepare a feasibility study to provide cycle routes on approach and through each town in Longford.

National routes in Longford make the county more accessible to airport and port locations and are also fundamental in providing connections with other urban centres. The national roads in Longford are highly trafficked critical inter-connecting national roads providing onward connection to ports and airports and other national roads. Safeguarding the levels of safety and strategic function of the national road is key to securing the objectives of Government policy.

It will be critical that any proposals for providing cycling infrastructure in the vicinity of national roads ensures road safety standards for all road users are adhered to and standards comply with TII Publications. In addition, TII recommends early consultation in relation to any potential impacts for the national road network and to ensure schemes can be progressed consistent with the provisions of official policy and complementary to safeguarding the strategic function of national roads.

4.2 Additional Transport Proposals

Objective CPO 5.46 supports the provision of bus priority measures on existing and planned road infrastructure while objective CPO 5.47 seeks to facilitate the provision of park and ride facilities.

Similar to comments above, where such proposals are identified in the vicinity of existing and proposed national roads, the council shall ensure road safety standards for all road users are adhered to and standards comply with TII Publications. In addition, such proposals should be plan-led or strategy based and TII recommends early consultation in relation to any potential impacts for the national road network to ensure schemes can be progressed consistent with the provisions of official policy and complementary to safeguarding the strategic function of national roads.

4.3 Mobility Management/Travel Planning

Objective CPO 5.11 of the Draft Plan outlines the objective of the Council to require Mobility Management Plans for major developments, Objective CPO 8.18 also refers. TII also recommends that the Council could take the opportunity to consider requiring Mobility Management/Travel Planning for existing trip intensive locations such as schools and significant employers, including business parks and industrial estates where employer's plans could be co-ordinated.

Recommendation

- TII would welcome consideration of the recommendations identified above relating to the provision of cycling infrastructure on or in the vicinity of the national road network outlined in Objective CPO 5.59 and Action A5.7 of the Draft Plan. Where such Objectives may have implications for the national road network, TII recommends early consultation to ensure schemes can be progressed consistent with the provisions of official policy and complementary to safeguarding the strategic function of national roads.
- TII recommends that the Council should consider further developing policies and objectives in the Draft Plan relating to Mobility Management/Travel Planning for existing trip intensive locations.

5. ANCILLARY POLICY PROVISIONS AND ISSUES

5.1 Service Areas

From a review of the Draft Plan it is unclear that a policy approach to service areas and roadside facilities on national roads has been addressed. TII would welcome the inclusion of the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities.

The planning authority will also be aware that Section 2.8 of the DoECLG indicates the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses road side service facilities on non-motorway national roads and their junctions.

While Section 16.4.12 of the Draft Plan addresses Development Management Standards relating to Service Stations, no reference to the DoECLG Guidelines, in particular, Section 2.8 has been included. TII respectfully requests that this matter is addressed prior to the adoption of the Development Plan.

Recommendation

- TII would welcome consideration being given to including the above provisions of the DoECLG Guidelines in formal policy included in the Development Plan and as a reference guide in Development Management Standards, prior to adoption, in the interests of road user safety and adherence to the provisions of official policy.

5.2 Safeguarding national road drainage regimes

TII would welcome consideration being given to including a new objective associated with Section 5.2.3 Roads and Streets, in particular, those policies related to national roads, relating to protection of national road drainage regimes. Significant improvements to the national road network have been overseen by Longford County Council. There is an onus and a policy requirement on road and planning authorities to safeguard the national investment made. In that regard, TII has experienced a number of instances nationally where private development proposals have accessed or sought to access national road drainage regimes to dispose of surface water drainage.

National road surface water drainage regimes are constructed with the objective of disposing of national road surface water, it is important that capacity in the drainage regime is retained to address this function.

Recommendation

- Having regard to the extensive national road network in Longford, TII would welcome a new Objective included in the Development Plan outlining that;

'The capacity and efficiency of the national road network drainage regimes in County Longford will be safeguarded for national road drainage purposes'.

5.3 Renewable Energy and Peatlands

Section 5.8 of the Draft Plan considers Renewable Energy. Objective CPO 5.129 outlines the Councils commitment to prepare a Renewable Energy Strategy for the County.

In relation to Solar Energy (Section 5.8.2), TII welcomes the Draft Plan outlining the requirement for the submission of Glint and Glare Assessments on Objective CPO 5.145. TII would particularly emphasise the importance of such assessments where there may be implications for the safety and efficiency of the strategic national road network given the high speed and highly trafficked nature of such roads. It is important that mitigation proposed is robust from the earliest stages of construction and/or commissioning and is sufficient to function year round.

In addition, for all renewable energy developments requiring grid connection to the national grid, TII recommends that an assessment of all alternatives for grid connection routing should be undertaken. It is considered inappropriate to only consider utilising the strategic national road network as a grid connection route when alternatives are available. From a review of the Draft Plan, it does not appear that this issue is considered.

In TII's experience, grid connection accommodated on national roads has the potential, inter alia, to result in technical road safety issues such as differential settlement due to backfilling trenches and can impact on ability and cost of general maintenance and safety works to existing roads. Constraints and costs arise to on-line national road improvements and upgrades also.

In relation to Peatlands, it is noted that proposed Objective CPO 12.45 outlines the Councils commitment to work with relevant agencies to prepare an after use framework plan for the peatlands in the county, and associated infrastructure.

The Council will be aware of the significant interface between the counties peatland resources and the strategic national road network. TII recommends that any future framework plan should have regard to the provisions of official policy relating to development management and access to national roads set out in the Section 28

Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012). In addition, TII is available for consultation with the Council in relation to any future peatlands after use framework plan prepared by the Council.

Recommendation

- Having regard to the foregoing, TII would welcome an objective included in the adopted Development Plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that it should be demonstrated that an assessment of all alternative grid connection routing options have been undertaken prior to any proposals being brought forward for grid connection routing utilising the national road network. Consideration to including a similar statement in the County Wind Energy Strategy (Appendix to the Draft Plan) would also be welcome.
- TII recommends that any future Peatlands Framework Plan should have regard to the provisions of official policy relating to development management and access to national roads set out in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012). TII is available for consultation with the Council in relation to any future peatlands after use framework plan.

6. OTHER PLANS/STRATEGIES

The reference to other subordinate plans and strategies supported by the Draft Development Plan is noted, for example, the requirement for a Local Area Plan for Longford, the preparation of a Local Transport Plan for Longford, a Peatlands After Use Framework Plan, a Renewable Energy Strategy for the County, etc.

Objective CPO 6.11 of the Draft Plan outlines the Councils intention to carry out Master planning for large areas of land in the context of ‘Regeneration’ proposals. Similar broader objectives are also included in Section 6.5.3 of the Draft Plan.

TII considers that where proposals are subject to Masterplan exercises, appropriate consultation with statutory stakeholders should be undertaken and TII recommends that any adoption process or framework should be clearly identified. TII is available for liaison with the Council in relation to any such masterplan lands impacting the national road network. Official policy requires that where masterplans are used to inform planning decisions, there is a requirement to incorporate them into relevant local area planning frameworks and to subject them to consultation.

Recommendation

- In relation to the preparation of other plans, strategies and masterplans, TII requests that where there are implications for the safe and efficient operation of the national road network, existing and proposed, that appropriate consultation with TII would occur. Where such non-statutory proposals are used to inform subsequent planning decisions, TII considers that they should be subject to consultation and incorporated into relevant local area planning frameworks.

7. OTHER SPECIFIC POLICIES AND OBJECTIVES

7.1 TII Publications Referencing

There are some instances in the Draft Plan where reference is made to the National Roads Authority’s Design Manual for Roads and Bridges (NRA DMRB). However, the Council will be aware that the NRA DMRB has been superseded and all relevant standards are now detailed in TII Publications. Updating such references in the Draft Plan should be addressed, for example, Section 5.2.3, Objective CPO 5.17 and Objective CPO 5.57.

It is noted that the Draft Plan also includes reference to DMURS and the approach of the Council to apply the principles outlined therein. In addition, the Council will be aware of complementary TII Publication ‘The Treatment of Transition Zones to Towns and Villages on National Roads’ (TII Publications DN-GEO-03084).

The TII Publications Standard describes the requirements that shall be implemented on National Roads on the approaches to towns and villages in terms of the provision of traffic calming measures and pedestrian crossings. National Roads within 60km/h zones can traverse many areas with very different characteristics such as low density

residential areas, industrial areas, mixed use neighbourhoods and town and village centres. This requires different design solutions within each of these different contexts.

Development Management Standards included in Chapter 16 address sight distance standards. The standard relating to national roads included in DMS 16.91 (230m) is different to the standard included in DMS 16.114 (215m). The Council may wish to address this.

Recommendation

- The Authority recommends that references to the NRA DMRB in the Draft Plan are updated to TII Publications.
- TII would welcome the Council giving consideration to also incorporating reference to TII Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in the Development Plan in association with reference to DMURS.
- Sightline standards applied to national roads shall accord with TII Publications Standards.

7.2 Traffic and Transport Assessment (TTA)

TII acknowledges that the requirement for TTA is outlined in Objective CPO 5.11 and Development Management Standard DMS 16.117 of the Draft Plan. To assist with TTA, the Authority has published the Traffic and Transport Assessment Guidelines (2014), which are available at www.tii.ie. TII requests that the Draft Plan references the TII TTA Guidelines as appropriate guidance in relation to development impacting national roads. The Guidelines also include recommendations on the requirement for sub-threshold traffic and transport assessments.

Recommendation

- TII would welcome the Draft Plan updated to reflect the requirement for TTA undertaken in accordance with the TII TTA Guidelines where national roads are impacted.

The TII TTA Guidelines relate specifically to development proposals with implications for the national road network and outline appropriate thresholds and sub-threshold limits at which TTA are required where there may be implications for the national road network.

7.3 Road Safety

TII's initial observations on pre-draft consultation outlined the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).

In the interests of clarification;

- **Road Safety Audit (RSA)** involves the evaluation of road schemes during design, construction and early operation to identify potential hazards to all road users. RSA is to be carried out on all new national road infrastructure projects and on any schemes/proposal which results in a permanent change to the layout of a national road (refer to TII Publications GE-STY-01024 Road Safety Audit).
- **Road Safety Impact Assessment (RSIA)** is described in the EU Directive on Road Infrastructure Safety Management (EU RISM) 2008/96/EC as a strategic comparative analysis of the impact of a new road, or for substantial modifications to an existing road, on the safety performance of the road network (refer to TII Publications PE-PMG-02001 Road Safety Impact Assessment).

TII welcomes reference to the requirement for RSIA in Objective CPO5.24 and recommends updating the NRA DMRB reference HD 18 to TII Publications ref. PE-PMG-02001.

It does not appear that the Draft Plan incorporates requirement for Road Safety Audit.

RSIA is a separate process to RSA. RSIA considers the safety impact of a scheme on the surrounding road network, while RSA examines the safety aspects within a scheme. RSIA and RSA both work to improve the safety performance of new roads and existing roads that require modifications due to projects or proposals. Both have consequences for the design and layout of any project.

TII would welcome reference to the requirement for Road Safety Audit to be included as new Objective in the Development Plan prior to adoption. Road Safety Audit should be undertaken on all new national road infrastructure projects and on any schemes or proposals which results in a permanent change to the layout of a national road (refer to TII Publications GE-STY-01024 Road Safety Audit).

Recommendation

- The Council is requested to review the Draft Plan to consider the requirement to address reference to RSA prior to adoption.
- TII recommends that consideration be given to updating the TII Publications reference concerning RSA from HD18 to TII Publications PE-PMG-02001 (Road Safety Impact Assessment).

7.4 Signage

Objective CPO 5.30 addresses signage on the road network, including national roads. TII welcomes reference to the NRA Policy on the Provision of Tourism and Leisure Signage on National Roads (2011) in Objective CPO 5.30.

In addition, Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines outlines Government policy relating to signage on national roads. TII respectfully recommends including reference to Section 3.8 of the DoECLG Guidelines and official policy relating to signage on national roads in Objective CPO 5.30 prior to adoption of the Development Plan in the interests of consistency and in the interests of clarity.

Recommendation

- It is requested that Objective CPO 5.30 is updated to incorporate reference to Section 3.8 of the DoECLG Guidelines in the interests of reflecting official policy on signage proposals impacting the national road network, in the interests of road user safety.

7.5 Noise

The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Development Plan prior to adoption. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation. Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities considers noise.

Where noise sensitive uses are proposed within proximity to a noise source, such as an existing or proposed national road, it will be important that development proposals include noise attenuation measures in any planning application. TII would welcome this requirement being included as a specific objective of the Plan prior to adoption.

Recommendation

- TII would welcome an additional objective in the Plan confirming the requirement that development proposals in proximity to a noise source, such as an existing or proposed national road, should include noise attenuation measures.

The DoECLG Guidelines clearly require that the costs of implementing mitigation measures, in the circumstances referred to above, should be borne by the developer/applicant. The Authority will not be responsible for the provision of additional noise mitigation.

8. SETTLEMENT PLANS/DEVELOPMENT STRATEGIES

Volume 2 of the Draft Development Plan includes Settlement Plans and accompanying settlement plan maps. TII provides the following observations for the Councils consideration.

8.1 Longford Town

It is noted that a Settlement Plan Map is included for Longford Town and that Objective CPO 4.8 of the Draft Plan indicates a commitment to undertaking a future local area plan. As indicated, TII would welcome consultation on

the Longford Town Local Area Plan process having regard to the significant national road interactions that exist in relation to the town.

In the interim, TII notes the settlement plan included in the Draft Plan for Longford Town includes a reduction in the availability of lands for short term development through the identification of Strategic Land Reserves. However, critical objectives relating to supporting infrastructure to facilitate the build out of lands identified are not included in the Draft Plan. This is considered a significant omission.

TII acknowledges previous collaboration in the preparation of the Longford Northern Environs Local Area Plan and the accompanying Strategic Transport Assessment undertaken. The Council will be aware that Section 8 'Infrastructure Phasing and Monitoring' of the Strategic Transport Impact Assessment (STIA) included with the Longford Northern Environs Local Area Plan clearly identified infrastructure improvements that would be required to facilitate proposed development and to ensure that development build out would not result in any sustained congestion on the existing N4 with the mitigation measures which were outlined in the STIA.

The absence of the mitigation measures in the current settlement plan creates a significant risk that associated development may be proposed in the absence of the agreed required mitigation, particularly with reference to the Northern Environs LAP lands, with significant resulting impact to the N4, national road.

TII considers that a review of the Longford Town Settlement Plan included in Appendix 1A is required to ensure that necessary supporting infrastructure and transport interventions are included in the Settlement Plan prior to adoption in order to safeguard the strategic function of the national road network. Previous commitments to undertake a Strategic Transport Assessment for the Southern Environs Area should also be reviewed for incorporation into the Draft Development Plan Settlement Plan.

In relation to the lands zoned in the Draft Development Plan Longford Town Settlement Plan located outside the line of the existing N4, i.e. to the east side, the Authority previously recommended that traffic/trip demand generated by proposed development is assessed to ensure that such traffic can be catered for in a manner that is complementary to and consistent with the strategic transport function of the N4, national primary road, pending delivery of N4 Mullingar to Longford Scheme. This remains the position of the Authority.

Finally, it is noted that the proposed Longford Town Settlement Plan makes no reference to the National Development Plan 'N4 Mullingar to Longford' Scheme. TII considers it critical that the proposed plan and accompanying settlement plan maps should support the delivery of the scheme and reserve lands required for the scheme free from development in accordance with the requirements of official policy.

Longford County Council has previously collaborated closely with TII in the development of the Longford Town Northern Environs Local Area Plan and TII remains available to liaise with the Council in the interests of addressing the issues identified in the foregoing.

Recommendation

- Review the proposed Longford Town Settlement Plan to ensure that necessary supporting infrastructure and transport interventions are included in the Settlement Plan prior to adoption in order to safeguard the strategic function of the national road network in accordance with previous agreements and commitments related to both the Longford Town Northern Environs Local Area Plan and the Southern Environs Local Area Plan.
- Traffic/trip demand generated by proposed development on lands zoned outside the line of the existing N4, i.e. to the east side, should be assessed to ensure that such traffic can be catered for in a manner that is complementary to and consistent with safeguarding the strategic transport function of the N4, national primary road, pending delivery of N4 Mullingar to Longford Scheme.
- Review the proposed Settlement Plan to incorporate the National Development Plan national road scheme objective related to the N4 Mullingar to Longford Scheme and reserve lands required for the scheme free from development in accordance with the requirements of official policy.

- TII would welcome consultation on the Longford Town Local Area Plan process having regard to the significant national road interactions that exist.

8.2 Granard

TII notes the zoning objective related to Industrial/Commercial/Warehousing on undeveloped lands to the south of the town and to the west side of the N55, national road. The subject lands adjoin the N55 at a location where a 100kph speed limit applies.

It is recommended that access to the lands concerned is clarified in the Settlement Plan to ensure access proposals comply with Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines. It is noted that access can be provided via existing Industrial/Commercial/Warehousing lands directly to the north prior to access to the N55 within the reduced 50kph urban speed limit area.

Recommendation

- Review access proposals for undeveloped Industrial/Commercial/Warehousing proposed lands to the south of the town and to the west side of the N55, national road, to ensure adherence to the provisions of official policy.

CONCLUSION

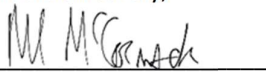
The Authority acknowledges the significant undertaking for the Council in drafting a Development Plan and the requirement to consider and address a multiplicity of factors in developing a sustainable spatial planning framework not just issues relating to national roads.

The Authority acknowledges and welcomes the generally positive alignment in the Draft Plan with official policy concerning development planning and development management and national roads and compliments the Council in this regard. Notwithstanding this there are a number of specific interactions between land use policy and development objectives included in the Draft Plan and the strategic national road network in County Longford that the Authority considers require review prior to the adoption of the Development Plan to ensure consistency with official policy and in order to safeguard the strategic function of the national road network in the area.

The Authority is available to meet the Executive of the Council to discuss any issues arising in the foregoing or other matters related to the Development Plan and national roads.

It is respectfully requested that the above observations are taken into consideration prior to the adoption of the Longford County Development Plan, 2021 – 2027.

Yours sincerely,



Michael McCormack
Senior Land Use Planner