

'Draft Longford Town Local Area Plan'  
Administrative Officer, Forward Planning  
Planning Department  
Longford County Council  
Áras an Chontae  
Great Water Street  
Longford  
Co. Longford

Email submission: [lap@longfordcoco.ie](mailto:lap@longfordcoco.ie)

**Dáta | Date**  
17/10/2024

**Ár dTag | Our Ref.**  
TII24-128962

**Bhur dTag | Your Ref.**

**RE: Longford Town LAP 2025 -2031 Stage 3: Draft Plan Public Consultation**

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) acknowledges notice of the publication of the above Longford Town Local Area Plan (LAP) 2025-2031 for public consultation. TII previously received notice of the making of the Draft Plan and provided feedback to subsequent Local Transport Plan (LTP) referred to in the Draft LAP. TII made submissions to both the pre-draft consultation phase of the above Draft LAP in November 2022 and Local Transport Plan (LTP) consultation in May and August 2023.

The following TII submission seeks to address the safety, capacity, and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outline the national, regional and local context associated with national roads and Longford Town *Project Ireland 2040*, and makes a number of recommendations which need to be considered as amendments by the planning authority prior to the adoption of the draft Local Area Plan:

- **Strategic Context**

*Project Ireland 2040, National Development Plan 2021 – 2030*, outlines the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. Official policy also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the *National Planning Framework*. This requirement is reflected in the existing statutory Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012). It is also amongst the guiding principles of the transport strategy of the EMRA Regional Spatial and Economic Strategy (RSES) in Regional Policy Objective (RPO) 8.1.

TII would also highlight that RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management. In addition, RPO 8.3 requires future development is to be planned and designed in a manner that *inter alia* maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned.

One of TII's functions is to ensure the maintenance and operation of safe and efficient national (primary and secondary) road and light rail networks. The Council are reminded that the national road network caters for Ireland's inter-urban and inter-regional transport requirements and gives access to regional and international markets through strategic airport and port locations. The Authority's priorities therefore in relation to existing national roads are the maintenance of the existing national road network, including junctions, safeguarding the Exchequer investment in national roads to date.

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

As part of TII's responsibilities for managing and improving the country's national road and light rail networks, the Authority sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology to be prepared to precede or accompany applications for developments or works. Technical guidance and standards are contained in TII Publications, available at <https://www.tiipublications.ie/>. The Council is also reminded of the specific requirements established in the Government's *NGS Circular No. 2 of 2022 re. Application of Guidelines and Standards in relation to works on Public Roads in Ireland* associated with the operation DMURS and TII Publications with the national road network.

The N4, N5 and N63 are part of the national road network and critical enablers of national, regional, and local development policy and are within and adjacent the Draft Longford Town LAP area. In particular, the N4 and N5 national primary road corridors run through County Longford intersecting at Longford Town and are identified as part of the TEN-T Comprehensive Network. In addition, the N63 national secondary road, provides important regional and inter-regional connectivity within and through the Midlands.

Significant Exchequer investment continues to be made in relation to the national road network in the vicinity of Longford Town. TII in collaboration with relevant Councils, is developing/progressing national road schemes and improvements in the vicinity of Longford in accordance with *National Development Plan* investment commitments and the *National Investment Framework for Transport in Ireland (NIFTI)*. Currently the N4 Mullingar to Longford (Roosky) scheme is progressing having reached its third *Public Consultation Phase – Emerging Preferred Corridor*.

**TII strongly recommends that the requirements to address the N4 Mullingar to Longford (Roosky) scheme and clarity on measures for the maintenance and protection of investment made in national road assets need to be fully addressed prior to the adoption of the Local Area Plan.**

### • Local Authority Plan Context

TII is aware that the Draft LAP is to replace the Longford Town & Environs LAP 2016 – 2022 (Variation no. 2 of the County Development Plan) that incorporates the superseded Southern and Northern Environs LAPs. Considerable collaborative agreement had been made with TII /NRA with regard to the integrated transport and planning of the Northern Environs. TII considers that this work remains relevant and co-exists with the local transport plan.

The Council is reminded Section 19(2) of the Planning and Development Act 2000, as amended "*application and content of local area plans*" requires that an LAP "*shall be consistent with the objectives of the development plan, its core strategy, and any regional spatial and economic strategy that apply to the area of the plan*". In accordance with national and regional policies, the current County Development Plan 2021 – 2027 seeks to protect and maintain the strategic traffic function of the national road network under *Core Strategy Strategic Aim no. 9* as follows:

*"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."*

As in the TII submission to the pre-draft stage of the LAP, TII continues to advocate an evidence-based approach to planning policy to ensure an integrated approach to the design of development areas that includes a set of principles and criteria designed to ensure a high standard of access by public transport, foot and private car. In this regard, TII welcomes that the Draft LAP has regard to the recently prepared Local Transport Plan.

TII would highlight section 4.3.3.1 *Roads* of the current LAP in setting OBJ RN1 and OBJ RN2 includes the requirement for detailed traffic impact assessments for development proposed to the north of the N4 Longford bypass and the sequential provision of local roads network provisions as an alternative to the N4/N5 bypass. The need for these assessments remains and needs to bring forward as matters to be addressed with TII in the draft Local Area Plan and any associated transport policies and objectives.

Unfortunately, having reviewed the Draft LAP, TII is unable to ascertain if impacts on, and, interactions with the national road network have been assessed and/or considered as required under the current LAP for this area or in a manner appropriate to demonstrate the protection of the national road network that has efficiency sensitivities to development of the town and at Abbeycarton and north of the N4 in particular but also on the N63.

In this regard, TII makes observations on Chapter 14 *Sustainable Transport* of the Draft LAP which focuses on Strategic Aim to promote increased delivery of sustainable transport within the Town to contribute to carbon emission reduction. TII advises that the protection of the national road network for intended strategic traffic in accordance with *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) contributes to this Strategic Aim.

Taking account of the above strategic and local contexts, TII makes the following recommendations for the consideration of the Council:

## **1.0 Draft LAP Chapter 14, Section 14.4 Longford Town Local Transport Plan 2023**

### **Recognition of requirements for observance and compliance with national road policy and standards**

The current County Development Plan 2021 – 2027 seeks to protect and maintain the strategic traffic function of the national road network under *Core Strategy Strategic Aim no. 9* indicates

*“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.”*

Reflecting this aim, the Local Transport Plan (LTP) in section 3.12 *Road Network* recognises that the national road network, consisting of national primary (N4 and N5) and national secondary (N63) components is governed by national road policy and design and guidance set out by TII.

Section 2.4 *Design Standards and Guidelines*, of Chapter 2 *Strategic Context* the LTP recognises that “As part of the implementation of the proposed infrastructure measures, a number of design standards and guidelines should be followed.” The list of documents includes the Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and TII Publications. As already indicated, the observance of the Government’s “*Spatial Planning and National Roads Guidelines for Planning Authorities*” is necessary to maintain the safe and efficient operation of the national road network, and compliance with the standards and guidance of TII Publications must be demonstrated for LTP measures that directly or indirectly impact the national road network.

TII Publications are the Government recommended design guidance for all roads where speed limits of greater than 60km/h apply. Having regard that the draft LAP boundary includes parts of the national road network and Government’s *NGS Circular No. 2 of 2022 re. Application of Guidelines and Standards in relation to works on Public Roads in Ireland*” it is appropriate that alongside DMURS, TII Publications needs to set design guidance for the national road network and associated infrastructure. This echoes the statement to like effect in section 1.3 *Application of this Manual* of DMURS. In this way, transport objectives forming part of the LTP will have had regard to national road network requirements by assessment of options against national road policy and standards ensuring the implementation of local transport measures that translate to development objectives of the LAP are complementary to maintaining the strategic function of the national road network. TII Publications are available at [www.tiipublications.ie](http://www.tiipublications.ie).

Having regard to the above matters, TII is concerned that Draft LAP *Sustainable Transport Objective ST01* appears to propose to adopt all measures in the LTP but neglects to clearly capture the requirements for observance of *Spatial Planning and National Roads Guidelines for Planning Authorities* and compliance with TII Publications as part of the implementation of measures impacting the national road network. TII consider that this is not in accordance with *Core Strategy Strategic Aim No. 9* of the County Development Plan 2021 – 2027.

It is therefore not evident in the Draft LAP that the transport measures which have become development objectives of the Draft LAP by *Sustainable Transport Objective ST01* have had regard, or will have regard in implementation, to the provisions of national roads policy by assessment of options against national road policy and standards ensuring the implementation of local transport objectives complementary to maintaining the strategic function of the national road network. This is a serious concern.

- **TII Recommendation no. 1 – Inclusion of the observance of national roads policy and TII Publications as part of transport measures proposed in the Draft LAP**

TII recommends that the *Sustainable Transport Objectives* clearly commit that any transport measures which interact with the national road network must observe *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) in the first instance, require prior consultation with TII and compliance with all relevant TII standards as detailed in TII Publications and *Core Strategy Strategic Aim No. 9* of the County Development Plan 2021 – 2027.

This should be complementary to Section 2.0 of this submission which recommends the overall revision and rationalisation of the Draft LAP's proposed *Sustainable Transport Objectives*.

## **2.0 Draft LAP Chapter 14, Section 14.4 Longford Town Local Transport Plan 2023**

### **Revision and rationalisation of 14.6 Sustainable Transport Objectives**

The Draft LAP proposes that *Sustainable Transport Objective ST01* is “Support the implementation of the Longford Town Transportation Plan 2023 and associated strategies contained therein.”

The approach taken in the Draft LAP under *Sustainable Transport Objective ST01* would appear to propose to adopt all measures identified in the LTP prior to their analysis in that LTP that itself at Chapter 8 appears to finally recommend certain, not all, of the measures identified in Chapter 6 of the LTP. TII notes that the Draft LAP refers and repeats a number of tables and figures from Chapter 6 of the LTP and refers the Draft LAP reader to that Chapter 6 of the LTP.

However, on review of the Draft LAP, TII remains confused as to which of the LTP measures are development objectives of the Draft LAP. For example, it is noted that Draft LAP proposed *Sustainable Transport Objective ST32* may refer to the LTP measures as at its final Chapter 8 (after analysis). *Sustainable Transport Objective ST32* will require revision to remove any conflict and confusion with proposed objective *ST01*.

Having regard to relevant national road network policy and standards, TII is concerned that national road policy and in particular TII Publications, given their standards role, do not appear to be recorded alongside other standards e.g. DMURS in ST05. TII is also concerned that the five proposed policy Objectives ST21 – ST25 which appear to directly refer to the national road network are unclear.

- **TII Recommendation no. 2 – Review of the transposing measures of the LTP intended to form development objectives of the Draft LAP**

TII strongly recommend a review and revision of the transposing treatment of the LTP into the Local Area Plan *Sustainable Transport Strategy and Objectives*. This is required to clarify which of the measures identified in the LTP are intended as development objectives of the Draft LAP. This clarification is essential to implementing and tracking the implementation and performance of the Draft LAP in the public interest and to direct potential developers as to the assessment and development requirements of individual sites and areas.

- **TII Recommendation no. 3 – Revision and rationalisation of 14.6 Sustainable Transport Objectives of the Draft LAP**

TII recommends revision and rationalisation of the *Sustainable Transport Objectives* to ensure clarity thereby clearly directing the primary public and developer LAP stakeholders. TII is unable to identify whether the protection of the safe and efficient operation of the national road network as part of the sustainable transport hierarchy of Longford Town will be observed in the implementation of the Draft LAP *Sustainable Transport Objectives*.

- **TII Recommendation no. 4 – Revision and rationalisation of 14.6 Sustainable Transport Objectives ST 21 – ST 25**

As above TII recommends an overall revision and rationalisation of the proposed *Sustainable Transport Objectives*, the following revision recommendations are recommendations that aid in the clarification of proposed Draft *Sustainable Transport Objectives* that refer the national road network, its policy and required TII Publications (standards and technical) observance.

TII recommended text revisions to Draft *Sustainable Transport Objectives* are in pink as follows

- “ST 21 ~~Address~~ **Protect** the safety, capacity and strategic function of the national road network in accordance with the provisions of official policy ~~and taking account of the requirements of~~ **as in** the Section 28 DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012). “
- “ST 22 **The Council in consultation with TII, c**arry out detailed traffic ~~impact~~ **and transport** assessments for development proposed to the north of the N4 Longford bypass and the sequential provision of local roads network provisions as an alternative to the N4/N5 bypass.”

In this revision, TII has regard to the header sentence of these objectives “It is an objective of the Council to”. It is therefore clear that the Council will be carrying out these traffic and transport assessments and not developers.

- “ST 23 Continue to progress the development of the N4 Mullingar-Roskeery dual carriageway with the relevant government departments and transport agencies.”
- “ST 24 Ensure that any proposed development shall **demonstrate compliance with TII Publications** ~~have regard to National policy concerning the preservation of the N4 national primary road for National/Regional Traffic.~~”
- “ST 25 Require that applications for planning permission on the industrially zoned lands to the north of the N4 Longford Bypass (see Appendix 1 Zoning map) shall be subject to a detailed traffic **impact and transport** assessment, **the terms of which shall be scoped by the Council in consultation with TII**, in advance of their consideration for development.”

The Council is also reminded of the necessity of the inclusion of TII Recommendation no. 1 of this submission amongst *Sustainable Transport Objectives*: that any transport measures which interact with the national road network must observe *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) in the first instance, require prior consultation with TII and compliance with all relevant TII standards as detailed in TII Publications (available at the TII Publications website [www.tiipublications.ie](http://www.tiipublications.ie)). This will also align with Core Strategy Strategic Aim No. 9 of the County Development Plan 2021 – 2027.

### **3.0 Draft LAP Chapter 14, Section 14.4 Longford Town Local Transport Plan 2023**

#### **Revision and rationalisation of approach to Abbeycarton Access Strategy**

TII observes that Section 14.4.9 appears to present two alternative “Access Strategies” for Abbeycarton described in sections entitled: 14.4.9.1 *Longford Northern Environs Local Area Plan 2008-2014 Option*; and 14.4.9.2 *Alternative Sustainable Proposal Option*.

In the first instance, TII recommends a revision of section 14.4.9 and its subsections. It is unclear to TII whether one option is preferred above the other, why and how it will be implemented and/or decided. TII suggests that an identification of the development access requirements and limitations of Abbeycarton would be useful to frame any preference.

This confusion is only heightened having regard to the currently proposed *Sustainable Transport Objectives* ST26, ST27, ST28 and ST29 that all relate to either or both Access Strategies creating the potential for elements of either Access Strategy to be implemented in development applications which will be piecemeal and unenforceable.

TII is also seriously concerned that the requirement for detailed traffic and transportation assessment of impacts of the access arrangements for the Abbeycarton lands on the N4 and N63 as recognised in the current LAP (Variation no. 2 of the County Development Plan) are lost in the Draft LAP. Any accesses to the Abbeycarton lands

have the potential to impact the N4, N63 and associated junction. Therefore, any access strategy should remain subject to the requirement for detailed traffic and transportation assessments by the County Council scoped with the assistance of TII.

The Council is reminded of the requirements of Section 2.7 Development at National Road Interchanges or Junctions of the *“Spatial Planning and National Roads Guidelines for Planning Authorities”* which requires that *“...planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.”*

Given the treatment of Draft LAP sections entitled: 14.4.9.1 Longford Northern Environs Local Area Plan 2008-2014 Option; and 14.4.9.2 Alternative Sustainable Proposal Option, TII are unable to evaluate and ascertain the potential impact on this key and heavily trafficked national road junction. TII consider that in the LAP as presented does not accord with the requirements of Section 2.7 Development at National Road Interchanges or Junctions of the *“Spatial Planning and National Roads Guidelines for Planning Authorities”*. TII therefore recommends:

- **TII Recommendation no. 5 – Review and Revision of the proposed Draft LAP Abbeycarton Access Strategy Approach.**

The Abbeycarton Access Strategy as presented in the Draft LAP requires review and revision as it is unclear which Strategy is preferred, why and how it is to be implemented.

Aligned to this, it is vital that recognising and recording the requirements that for any Abbeycarton Access Strategy should be subject to the requirement for detailed traffic and transportation assessments by the County Council scoped with the assistance of TII to inform future development applications in the area.

In this way, the delivery of access arrangements for Abbeycarton will be formally identified for future individual applications and other development proposal mechanisms may be assured of being in accordance with an access strategy that has been appropriately evidenced and assessed.

Similarly, proposed *Sustainable Transport Objectives* ST26, ST27, ST28 and ST29 require revision to ensure that they reflect and promote the Abbeycarton Access Strategy whilst recognising higher order development policy and objectives taking cognisance of requirements of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012).

## Conclusion

Having regard to the contents of this submission and the critical location of Longford on the national road network, the 5 no. recommendations made herein are in accordance with higher order land use and transportation policy and therefore in the interests of the sustainable planning and development of Longford Town.

TII records its availability to meet the executive of the County Council alongside the NTA to discuss any issues arising in the foregoing.

Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001 as amended.

Yours faithfully,



on behalf of  
Land Use Planning Unit

\*Note: In accordance with the provisions of section 13 of the Roads Act 2015, Transport Infrastructure Ireland (TII) is the operational name of the National Roads Authority with effect from 1 August 2015.

All planning application referral documentation, including applications, submission acknowledgments, further information notifications and decisions should be notified electronically to TII at [landuseplanning@tii.ie](mailto:landuseplanning@tii.ie). TII would appreciate your Authority's assistance on this matter.