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e. submission; www.offaly.ie/occ_mini_websites/CDP/

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Ár dTag | Our Ref.
TII20-110211

Re. **Draft Offaly County Development Plan, 2021 - 2027**

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on the Draft Offaly 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 EU TEN-T 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 N/M7 Dublin to Limerick corridor through Offaly is included as part of the EU TEN-T Core Network and the N/M6 Dublin to Galway corridor is included as part of the EU TEN-T Comprehensive Network.

In addition, the N52, N62 and N80, national secondary roads, are important road corridors in the County. 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;

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- *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.

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 8.5 of the Draft Plan confirms that the Council is aware of the vital importance of Motorway and National Routes to the economic and social development of County Offaly and the country. 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 8.5.

Recommendation

- TII would welcome Chapter 2 Core Strategy 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 2 Core Strategy of the Draft Development Plan strategic objectives to reflect the foregoing policy requirements, which are summarised as;
 - a) to maintain the strategic function, capacity and safety of the national roads network, and
 - b) 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 Tullamore, identified as a Key Town in the EMRA RSES, and Birr, a Self-Sustaining Growth Town, is deferred to future local area planning; Core Strategy Objective CSO-04 refers. TII would welcome consultation on the Tullamore and Birr Local Area Plan process having regard to the significant national road interactions that exist in relation to both towns.
- The Draft Plan also includes the commitment to undertake a Local Transport Plan for Tullamore in conjunction with the NTA; Objective SMAO-02 refers. TII considers that the preparation of a Local Transport Plan should inform the preparation of a Local Area Plan for Tullamore 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: DOECLG SPATIAL PLANNING AND NATIONAL ROADS GUIDELINES

2.1 Access to National Roads

Section 8.5.1 of the Draft Plan discusses and outlines policy in relation to Motorways and National Routes. Reference is made to restricting and assessing future development proposals requiring direct access onto National Secondary routes against the provisions of Table 4.2 of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). TII recommends that this reference to Table 4.2 is reviewed as it does not appear to reflect the relevant policy section of the DoECLG Guidelines.

TII welcomes the provisions of Policy SMAP-19 and Policy SMAP-20 which support safeguarding the levels of safety and strategic function of the national road network in the County.

Policy SMAP-21 addresses specific policy concerning access to national roads. TII is of the opinion that Policy SMAP-21 could 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 policy (Policy SMAP-21) includes reference to accommodating 'exceptional circumstances' of national and regional strategic importance. The approach proposed by the Council appears to defer critical decisions in relation to such proposals to the development management process. In TII's opinion, this is contrary to the provisions of the Section 28 Ministerial Guidelines on Spatial Planning and National Roads which clearly require such proposals to be plan led and applied as part of a Development Plan review; Section 2.6 of the DoECLG Guidelines refer.

In the interests of clarification, while Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities outlines 'exceptional circumstances' where a less restrictive approach to the control of access to national roads may be applied, such an approach must be plan-led. Identifying cases on a case by case basis deferred to the development management function of the planning authority is considered inappropriate, contrary to the approach identified in Government policy and presents significant uncertainty for prospective applicants, their agents and/or developers.

Having regard to the issues identified in the foregoing, TII respectfully suggests consideration is given to reviewing the text of proposed Policy SMAP-21 and outlines the following text for the Councils consideration;

*SMAP-21 It is Council policy that development(s) requiring a new direct access or an intensification of an existing access onto a National Secondary road, or onto a privately owned road leading onto a National Secondary road where a speed limit greater than ~~50~~ 60 km/ph applies will be ~~restricted~~ avoided in accordance with the provisions of Spatial Planning and National Roads Guidelines for Planning Authorities, January 2012. Exceptional circumstances may be considered where the development is of national and regional strategic importance *is plan-led* and complies with the criteria set out in the Spatial Planning and National Roads Guidelines in this regard.*

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. The Council will be aware of previous collaboration in this regard to accommodate development of national and regional strategic importance on the N52, national road, Tullamore.



Recommendation

- TII recommends review of the reference to Table 4.2 of the DoECLG Spatial Planning and National Roads Guidelines (2012) in Section 8.5.1 of the Draft Plan.
- TII requests consideration is given to reviewing the text of proposed Policy SMAP-21 as outlined in the foregoing;

SMAP-21 It is Council policy that development(s) requiring a new direct access or an intensification of an existing access onto a National Secondary road, or onto a privately owned road leading onto a National Secondary road where a speed limit greater than 50 60 km/ph applies will be restricted avoided in accordance with the provisions of Spatial Planning and National Roads Guidelines for Planning Authorities, January 2012. Exceptional circumstances may be considered where the development is of national and regional strategic importance is plan-led and complies with the criteria set out in the Spatial Planning and National Roads Guidelines in this regard.

- 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 Policy RTCP-04 and Policy RTCP-07.

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) Opportunity Sites

In relation to Opportunity Sites identified in Chapter 7 of the Draft Plan, it is noted that Opportunity Site 9 is identified in the Ardan area of Tullamore in proximity to the N52, national road, and associated junction. Section 7.2.4 of the Draft Plan and Policy RP-11 both outline the requirement to prepare a Masterplan for Opportunity Sites.

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 in the plan making process, particularly where Masterplans are to be used in the decision making process of associated planning applications. Clarification of processes, stakeholder consultation and adoption should be outlined.

Having regard to the specific location of Opportunity Site 9 adjacent the strategic national road network and associated junctions, TII recommends that development proposals and masterplanning on the site are appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the national road network and associated junctions. Proposals should consider the cumulative impact of development in the area and be subject to Traffic and Transport Assessment. Where measures are required to upgrade the junctions concerned or adjoining national roads to facilitate planned development the costs of such works is matter for the Council and/or developers concerned. Proposed works to the national road network should be undertaken in consultation with TII. In that regard, principles set out in Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines should be incorporated into any formal masterplanning exercise engaged by the Council and/or developer of the subject lands.

c) Tourism

Chapter 6 Objective TRO-08 outlines the Councils objective to develop proposals in conjunction with the OPW for Durrow Abbey and Monastic Site to become a key tourist attraction in County Offaly and potentially become a UNESCO World Heritage Site by enhancing the visitor experience through the provision of signage, improved



access, and associated infrastructure as appropriate and as resources allow. Draft Plan Policy TRP-13 and Chapter 10 Built Heritage Policy BHP-41 also relate.

The Council will be aware that Durrow Abbey has an existing direct access to the N52, national road at a location where a 100kph speed limit applies. Any proposals prepared for Durrow Abbey in the context of Objective TRO-08, Policy TRP-13 and Policy BHP-41 must take full cognisance of and demonstrate adherence to the provisions of official policy outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines' (DoECLG, 2012). TII is available to liaise with the Council on this matter but in the interim would welcome the Draft Plan reflecting the foregoing requirements in the interests of road user safety, clarity and to inform any future development proposals related to the site.

d) 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. Section 5.6 of the Draft Plan sets out the Councils Rural Economic Strategy.

TII acknowledges and supports the need to sustain rural communities.

TII would welcome inclusion in this Section of 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. An appropriate cross reference with Policy SMAP-19, Policy SMAP-20 and Policy SMAP-21 of the Draft Plan would be welcome and is considered important 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.

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.
- Where identified Opportunity Sites are subject to proposed Masterplan exercises, TII considers that appropriate consultation with statutory stakeholders should be undertaken and that such a requirement should be reflected in the Draft Plan. Also, any adoption process or framework should be clearly identified in the plan making process, particularly where Masterplans are to be used in the decision making process of associated planning applications.
- Tullamore Opportunity Site 9 should clearly outline the requirement to prepare the subject Opportunity Site Masterplan in accordance with the principles set out in Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines and subject to appropriate Transport Analysis. Such requirements should be incorporated into the text of the Draft Plan associated with Opportunity Site 9.
- Proposals related to the Durrow Abbey Monastic Site should take full cognisance of and demonstrate adherence to the provisions of official policy outlined in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines' (DoECLG, 2012). TII is available to liaise with the Council on this matter but in the interim would welcome the Draft Plan reflecting the foregoing requirements in the interests of road user safety, clarity and to inform any future development proposals related to the site.
- 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 Policy SMAP-21 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 8 relating to access to national roads is included as a Policy Objective in Chapter 5 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 Rural Tourism, Agriculture, including Farm Diversification, Forestry, Extractive Industry, 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.

The above requirements, as outlined in the foregoing, appear to be relevant to Tullamore Opportunity Site 9.

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 8 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 Tullamore Local Area Plan. It is welcome that the Draft Plan confirms that a Local Transport Plan will be undertaken for Tullamore and TII considers that the Local Transport Plan should inform development objectives and land use planning objectives for the Tullamore Local Area Plan. 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 Offaly in accordance with National Development Plan investment commitments. The following scheme is included as a Scheme at Pre-Appraisal/Early Planning in Project Ireland 2040|National Development Plan, 2018 – 2027;

- **N52 Tullamore to Kilbeggan**

TII welcomes that the NDP Scheme identified above is included in Objective SMAO-09 of the Draft Plan. Reference to the NDP status of the Scheme in Objective SMAO-09 would be welcome.

It is a concern that the text relating to the N52 National Development Plan Scheme included in Roads Objective SMAO-09 outlines a specific project process included in Section 8.5.4 of the Draft Plan; '*Corridor and Route Selection Process*'.

In that regard, the Council will be aware that 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 the Section 8.5.4 Corridor and Route Selection Process to National Development Plan Schemes in order to avoid any unintended consequences and to avoid any ambiguity in relation to the delivery of the National Development Plan Scheme.



In the interests of clarity, TII would not support the additional requirements of Section 8.5.4 of the Draft Plan relating to Corridor and Route Selection Process in addition to processes already applied to national road scheme planning. The following text alteration is outlined for the Councils consideration;

Roads Objective SMAO-09

N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) in accordance with National Development Plan investment objectives taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, including section 8.5.4 Corridor and Route Selection Process.

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 Policy SMAP-18 of the Draft Plan outlines the policy of the Council to facilitate the development of the road network in Offaly, etc., in accordance with the National Development Plan and Government policy.

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. The current Draft Plan does not appear to include this requirement.

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 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 Offaly, 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 outlined in the table accompanying Objective SMAO-09 of the Draft Plan which are in addition to the schemes included in the National Development Plan, identified above, and advises that 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. While proposals should be developed complementary to safeguarding the strategic function of the national road network, 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 reference to the National Development Plan status of the N52 Tullamore to Kilbeggan Scheme in Objective SMAO-09.
- 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'.*

3.2 Corridor and Route Selection Process

TII notes that a Corridor and Route Selection Process has been identified in Section 8.5.4 of the Draft Plan; comments above also refer. The Council will be aware that 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.

As outlined above, TII requests that the Council give very careful consideration to the decision to include the requirement to apply Section 8.5.4 Corridor and Route Selection Process of the Draft Plan to National Development Plan Schemes in order to avoid any unintended consequences and to avoid any ambiguity in relation to the delivery of the National Development Plan Scheme.

In the interests of clarity, TII would not support the additional requirements of Section 8.5.4 of the Draft Plan relating to Corridor and Route Selection Process in addition to processes already applied to national road scheme planning.

Recommendation

- TII would welcome clarification in the Draft Plan relating to the proposed application of Section 8.5.4 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 SMAO-09 and text associated with the N52 should also be reviewed.

4. OTHER TRANSPORT PROPOSALS

4.1 Policy SMAP-17; Cycle Lanes Along the N80

Policy SMAP-17 outlines support and proposes exploring opportunities for the provision of cycle lanes along the N80, preferably off road and segregated from vehicle traffic where feasible.

As outlined in the Draft Plan, national secondary routes in Offaly, including the N80, make the county more accessible to ports and are also fundamental in providing connections with other urban centres. The N80 is a highly trafficked critical inter-connecting national secondary road providing onward connection to the N11/N25 and Rosslare Port via Carlow. Safeguarding the levels of safety and strategic function of the national road is key to securing the objectives of Government policy.

The National Development Plan contains no investment objectives for the upgrade of the N80, national secondary road. It will be critical that any proposals for providing segregated cycle lanes along the N80 ensure 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 Mobility Management/Travel Planning

Objective CAEO-10 of the Draft Plan outlines the objective of the Council to prepare Mobility Management and Travel Plans for Tullamore and Edenderry to bring about behaviour change and more sustainable transport use.

TII also recommends that Draft Plan should consider incorporating Mobility Management/Travel Planning for proposed business and enterprise proposals and other trip intensive developments. The Council could also 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 the N80 national road corridor outlined in Policy SMAP-17 of the Draft Plan. Where such a Policy Objective 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.

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.

Recommendation

- TII would welcome consideration being given to including the above provisions of the DoECLG Guidelines in formal policy included in the Development Plan, 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 8.5.1 Motorways and National Routes relating to protection of national road drainage regimes. Significant improvements to the national road network have been overseen by Offaly 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 and motorway network in Offaly, 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 Offaly will be safeguarded for national road drainage purposes'.



5.3 Renewable Energy and Peatlands

Section 3.2 of the Draft Plan considers renewable energy. In relation to Solar Energy (Section 3.2.5) TII would welcome the Draft Plan outlining the requirement for the submission of Glint and Glare Assessments with relevant applications where there may be implications for adjoining national roads.

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. The Council will be aware of such considerations which were assessed as part of planning application ref. 18/230 (An Bord Pleanála case ref. PL19 .304056)

In relation to Peatlands, it is noted that proposed Policy CAEP-13 outlines the Councils policy to support the preparation of a comprehensive after use framework plan for the industrial peatlands and associated workshops, office buildings and industrial sites.

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 would welcome the Draft Plan outlining the requirement for the submission of Glint and Glare Assessments with relevant applications where there may be implications for adjoining national roads.
- 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 Local Area Plans for Tullamore and for Birr, the preparation of a Local Transport Plan for Tullamore and a Peatlands After Use Framework Plan, etc.



Recommendation

- In relation to the preparation of such plans and strategies, 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.

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.

It is noted that Policy SMAP-03 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.

Recommendation

- The Authority recommends that references to the NRA DMRB in the Draft Plan are updated to TII Publications, for example Development Management Standard DMS-97 and DMS-105.
- 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.

7.2 Traffic and Transport Assessment (TTA)

TII acknowledges that the requirement for TTA is outlined in Policy SMAP-24 of the Draft Plan and that Development Management Standard DMS-105 specifically references the TII Traffic and Transportation Guidelines. In addition, it is also noted and welcome that the requirement for TTA is identified in relation to Retailing included in Chapter 7.

While reference to Table 2.1 and 2.2 of the TII Traffic and Transportation Guidelines in DMS-105 is welcome, TII would also welcome the Draft Plan including reference to Table 2.3 of the Guidelines. Table 2.3 addresses the application of sub-threshold criteria for Traffic and Transport Assessment, particularly where national roads are impacted. TII would welcome the Draft Plan updated to reflect the requirements of Table 2.3 also, in the interests of consistency.

Recommendation

- TII would welcome the Draft Plan updated to reflect the requirements of Table 2.3 of the TII Traffic and Transport Assessment Guidelines which address the requirement for TTA in relation to sub-threshold development.

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).

RSIA is a separate process to RSA. While RSA examines the safety aspects within a scheme, RSIA considers the safety impact of a scheme on the surrounding road network. 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 welcomes the reference to the requirement for Road Safety Audit in Policy SMAP-24 and Development Management Standard DMS-105. In the interests of clarity TII recommends reference to Road Safety Audit Guidelines (TII, 2017) in DMS-105 should remove the reference year. TII Publications are updated regularly. TII would recommend consideration of the following text; Road Safety Audit Guidelines (TII Publications).

Recommendation

- The Council is requested to review the Draft Plan to consider the requirement to address reference to RSIA prior to adoption.
- TII recommends that consideration be given to removing the reference year to RSA in DMS-105 (i.e. 2017) and instead to consider simply referencing '*Road Safety Audit Guidelines (TII Publications)*'.

7.4 Signage

Section 13.9.9 DMS-86 National Routes addresses signage on national roads. It is welcome that the development management standard outlines a presumption against signage on higher speed sections of national roads. While it is indicated that TII consent is required for such signage, the Council will be aware that TII is not a planning authority and is not in a position to grant or withhold consent in the manner outlined in the Draft Plan. TII recommends that this element of DMS-86 is reviewed accordingly.

In addition, it is noted that although reference to Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities which outlines official policy on the provision of signage on national roads is included in Objective TRO-05, TII would welcome DMS-86 updated to reflect reference to this official policy provision also, in the interests of clarity.

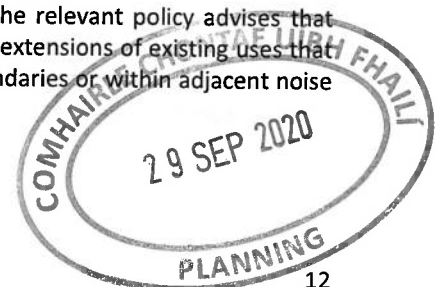
TII notes and welcomes reference to the TII Policy on the Provision of Tourism and Leisure Signage on National Roads in the Draft Plan.

Recommendation

- It is requested that DMS-86 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

TII acknowledges that Noise is addressed in Section 11.5.7 of the Draft Plan. The relevant policy advises that planning permission will not normally be granted for new uses / development or extensions of existing uses that produce significant and unacceptable levels of noise and/or vibration at site boundaries or within adjacent noise sensitive areas, especially residential areas.



In addition, Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities also 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.

It is noted that Settlement Plan Maps are included for both Tullamore and Birr. In relation to both settlements it is noted that local area planning is proposed. TII would welcome consultation on the Tullamore and Birr Local Area Plan process having regard to the significant national road interactions that exist in relation to both towns.

In the interim, TII notes Opportunity Sites identified in Tullamore, discussed above, and recommends that the preparation of significant development proposals in the environs of the strategic national road network and associated junctions should have regard to the provisions of the DoECLG Spatial Planning and National Roads Guidelines.

TII considers that the preparation of local area plans for Tullamore and Birr should have due cognisance of the DoECLG Guidelines provisions, including in relation to Birr aligning development zonings with speed limits on national roads in accordance with Section 2.11 of the Guidelines and the policy provisions of Section 2.5 of the Guidelines.

In terms of statements that relate to other settlements on or in the vicinity of national roads, the following observations are outlined for the Councils consideration.

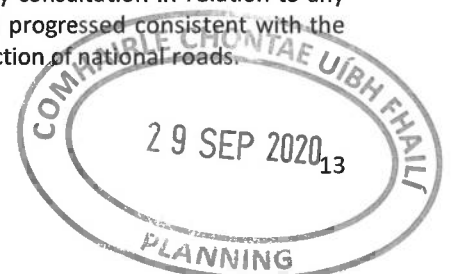
Ferbane Town Plan

TII notes opportunity sites identified in Ferbane, Opportunity Site 1 and 2. It is acknowledged that the locations are town centre. It is noted that the Council proposes subjecting the Opportunity Sites to future Masterplans.

The Ferbane Town Plan also includes proposed pedestrian and Cycleway links from the town to the Grand Canal. In particular, an 'on road footpath' link is indicatively proposed south of the town extending along the N62, national road. The N62, national road, for part of the proposed footpath link has a high speed 80kph speed limit.

As outlined in the Draft Plan, national secondary routes in Offaly, including the N62, make the county more accessible and are fundamental in providing connections with other urban centres. The N62 is an important inter-connecting national secondary road. Safeguarding the levels of safety and strategic function of the national road is key to securing the objectives of Government policy.

The National Development Plan contains no investment objectives for the upgrade of the N62, national secondary road. It will be critical that any proposals for providing 'on road footpath' links to the Grand Canal Greenway along the N62, outside reduced urban speed limit locations, ensure 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.



Recommendation

- 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 in the plan making process, particularly where Masterplans are to be used in the decision making process of associated planning applications.
- Given the location of the Opportunity Site 1 and 2, TII considers that the cumulative impact should be assessed and proposals developed complementary to safeguarding the strategic function of the national road network.
- TII would welcome consideration of the recommendations identified above relating to the provision of 'on road footpath' links to the Grand Canal Greenway along the N62. Where such an objective 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.

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 Offaly 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 Offaly County Development Plan, 2021 – 2027.

Yours sincerely,



Michael McCormack
Senior Land Use Planner

