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Dáta | Date
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Ár dTag | Our Ref.
TII23-123894

Re: Draft Clonmel Local Area Plan, 2024 – 2030

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the Draft Clonmel Local Area Plan, 2024 – 2030. Having reviewed the Draft Local Area Plan, TII acknowledges the significant work undertaken in preparing and publishing the Local Area Plan which has incorporated a Local Transport Plan in Appendix 2 and, in combination, provide an integrated local sustainable planning and transport framework for Clonmel.

The Council will be aware that National Roads play a key role within Ireland's overall transport system and in the country's economic, social and physical development. The national road network provides strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports, and provides access between all regions in the state.

The N24, national primary road, through the LTP area is an important strategic national road and provides important regional and inter-regional connectivity within and through the Southern Region, Tipperary, Clonmel and the Clonmel Environs. The route is an important strategic national road and gives access to regional and national markets and links with other strategic national roads providing onward connection to strategic airport and port locations with access to international markets.

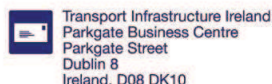
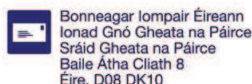
Pending the delivery of the NDP N24 Waterford to Cahir Scheme, safeguarding the function and capacity of the existing N24 strategic route and the safety of all road users remains a critical consideration in accordance with Government policy. As such, in accordance with Government policy, policies and objectives included in the Draft Local Area Plan are required to maintain the strategic capacity and safety of the network of national roads.

Taking account of these factors, TII has reviewed the Draft Clonmel Local Area Plan, 2024 – 2030, and accompanying Local Transport Plan in the context of official policy provisions and Regional Policy Objectives. The following observations elaborate on the above points and are provided for the Councils consideration.

1. DEVELOPMENT STRATEGY AND NATIONAL ROADS

Regional Policy Objective RPO 140 of the Southern Regional Assembly Regional Spatial and Economic Strategy (SRA RSES) outlines the requirement to sustainably maintain the strategic capacity and safety of the national roads and rail network including planning for future capacity enhancements, thus giving effect to National Strategic Outcome (NSO) 2 of the National Planning Framework (NPF).

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Such an approach conforms to requirements set out in the NPF, the National Development Plan (NDP) and the National Investment Framework for Transport in Ireland (NIFTI) of maintaining the strategic capacity and safety of the national roads network to a robust and safe standard for users.

TII Recommendation

TII welcomes that Section 6.5 of the Draft Local Area Plan and related Policy 6.8 reflect the foregoing provisions of official policy and identify the relevant policy, guidance and standards applicable to development proposed in the Local Area Plan impacting national roads.

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.

2. LOCAL AREA PLAN/LOCAL TRANSPORT PLAN INTEGRATION

To give effect to both NSO 1 Compact Growth and NSO 4 Sustainable Mobility in facilitating a transition to more sustainable modes of travel and reduction in demand for use of the private car in urban areas, TII supports the preparation of a Local Transport Plan (LTP) integrated with the preparation of the Draft Local Area Plan.

TII acknowledges and welcomes the focus on consolidation and compact growth that underpins the Draft Local Area Plan and the supporting Active Travel and Sustainable Transport Measures set out in the Draft Local Transport Plan.

Having regard to the extent of the national road network in and adjoining the Draft Local Area Plan area, TII particularly welcomes the associated confirmation in Section 3.2 of the Draft Local Transport Plan, consistent with text outlined in the Draft Local Area Plan, that an overarching aim in the development of all LTP transport measures is the need to safeguard the strategic function, capacity and safety of the existing national road network in the plan area.

Specific Local Transport Plan Measures

Table 2.9, the LTP SWOT analysis, advises that the existing N24 bypassing Clonmel reaches capacity during peak commuter and shopping periods leading to congestion and delay. Therefore, it is critical that policies and objectives of the Draft Local Area Plan and any measures proposed in the Local Transport Plan are appropriately plan-led and safeguard the strategic function of the existing national road pending the delivery of the N24 Waterford to Cahir Scheme.

The Draft Local Transport Plan includes a number of measures that impact the strategic national road network in the Plan area, for example;

- Figure 6.1 shows measures proposed along the N24, national road, and indicated as being 'Under Review as part of the N24 Waterford to Cahir Project' while other measures at N24 national road junctions are identified as 'Footpath Enhancements and Traffic Calming', and
- Section 6.4 of the Draft LTP indicates Future Road Reservations, Table 6-5 and Figure 6-21 refer, and outline;
 - R19 & R20 Cahir Road Roundabout to the Ard Gaoithe Business Park, and
 - R23 Moangarrif Roundabout to R680 Coleville Road

It is noted that the specific measures are not included in the Draft LAP as the Draft LTP indicate that the proposals are longer term.

Notwithstanding, the proposed road links do represent enhanced connectivity to the N24, national road. In particular, Measure R19 and R20 are proposed via the Cahir Road Roundabout through the extensive lands identified 'Employment' at Ballingarrane. This connection to the N24, national road, is at a roundabout location on the national primary road network where a 100kph speed limit applies. TII has previously advised that careful consideration in terms of accessibility and in terms of policy is required for such additional connectivity to the N24, national road, at this location. This matter is addressed further under the heading of 'Specific Local Area Plan Objectives' in Section 3 below.

TII Recommendation

TII welcomes that Section 6.5 of the Draft Local Area Plan confirms that proposals for new development on or affecting national roads within the LAP area, including the implementation of specific objectives in the LAP and Local Transport Plan, shall take account of the relevant TII Publications (Guidance and Standards) and notes that this requirement is also reflected in the LTP.

TII welcomes that Section 6.4 of the Draft LTP acknowledges that any works to a junction on a national road remain subject to TII Publications and completion of a Design Report.

While TII welcomes the reference in Section 6.5 of the Draft Local Area Plan, it remains the requirement that a Design Report is completed and submitted for works to national roads in accordance with TII Publications DN-GEO-03030 (Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes).

In the interests of clarity and in TII's opinion, although referenced elsewhere in the Draft Local Transport Plan, Table 2.1 would benefit from update to include reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2, RPO 140 and RPO 157.

3. SPECIFIC LOCAL AREA PLAN OBJECTIVES

i. Enhanced Regional Accessibility; N24 Waterford to Cahir Scheme

TII notes and welcomes the inclusion of the NDP N24 Waterford to Cahir Scheme in Section 6.4 of the Draft Local Area Plan and associated policies and objectives.

Notwithstanding, there are a number of clarifications, in TII's opinion, required to the text of the Draft Local Area Plan in relation to the NDP N24 Waterford to Cahir Scheme, in the interests of consistency and to ensure that the Draft Plan reflects the up-to-date position of the Scheme development. TII recommends the following;

- The Scheme should be referred to as the 'N24 Waterford to Cahir Scheme' in the interests of consistency and to ensure alignment with the National Development Plan objective.
- The Draft Plan appears to confirm that the 4 No. link road options form part of the Preferred Transport Solution for the scheme, this is premature as the Peer Review process has only just commenced and public display of the Preferred Option is not anticipated before mid-Q4, 2023. This is a concern.
- In the interests of safeguarding the investment in the NDP N24 Waterford to Cahir Scheme to date and providing for its future delivery, TII suggests the following wording amendment to Policy 6.5 of the Draft Plan;

'Preserve the Study Area and Route Corridor Options, or, when it emerges, the corridor of the Preferred Option for the proposed N24 Waterford to Cahir Scheme (Major National Road Project).'

- TII is concerned that proposed Policy 6.6 of the Draft Local Area Plan appears to provide that part of the NDP N24 Waterford to Cahir Scheme (i.e. the proposed link roads) may be delivered as part of new development.

TII advise this is statement is inaccurate. The statement is considered premature and could also potentially delay undermine the NDP N24 Waterford to Cahir Scheme Preferred Option. TII, therefore, recommends that proposed Policy 6.6 is reviewed and omitted from the Draft Local Area Plan.

Having regard to the foregoing, TII recommends review of the text and associated policies included in the Draft Local Area Plan related to the N24 Waterford to Cahir Scheme and recommends consultation with the N24 Project

Design Team to ensure an accurate and up to date position of the N24 Scheme is included in the Local Area Plan prior to finalisation.

ii. Employment Lands at Ballingarrane

Section 4.2 of the Draft Local Area Plan addresses Clonmel Strategic Employment sites and the strategic importance to the region of the Ballingarrane Business, Science and Technological Campus is evident. The Draft LAP confirms that the site is accessed from the N24 Cahir Road Roundabout.

The N24, national primary road, at this location, is subject to a 100kph speed limit. Therefore, as TII has previously consistently advised, there are significant policy issues to address relating to any intensification of use of this access to ensure proposals are consistent with the relevant specific provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) as well as accessibility, capacity and road safety considerations. The Council will be aware that direct access and intensification of direct access to a national road at a 100kph speed limit location, as in the case of the lands at Ballingarrane, conflict directly with the provisions of official policy.

TII is not aware of any evidence base developed to address the requirements of the DoECLG Ministerial Guidelines by the planning authority. TII considers it critical that the foregoing official policy issues are addressed appropriately by the Council prior to finalising the Local Area Plan.

In addition, in TII's opinion, LTP measures should clearly align with the development of the strategic employment sites. TII is concerned that the matters of compliance with the 'Spatial Planning and National Roads Guidelines for Planning Authorities' have not been addressed in the LTP. It is recommended that clarification be incorporated into both the LAP and LTP to demonstrate alignment in the delivery of the sustainable transport and active travel measures supporting the strategic employment sites.

Related to the above point, although not included in the Draft Local Area Plan, Section 6.4 of the Draft LTP indicates Future Road Reservations (Measures R19 & R20) in Table 6-05 and Figure 6-21 that combine to link the Ard Gaoithe Business Park (Cashel Road) to the N24 Cahir Road Roundabout.

TII acknowledges that the Measures are not included in the Draft Local Area Plan but notes that the Draft LTP outlines that a corridor be retained to potentially support the future expansion of the Town beyond 2030. This potential future connection to the N24, national road, is at a roundabout location on the national primary road network where a 100kph speed limit applies.

TII has previously advised that careful consideration is required in terms of the policy under the 'Spatial Planning and National Roads Guidelines for Planning Authorities' for such additional connectivity to the N24, national road, at this location. TII recommends that the Measures should only progress, at such time as they may, cognisant of policy and safety requirements in accordance with official policy set out in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and that such confirmation should be reflected in the Draft LTP prior to finalisation.

TII Recommendation

- The Local Area Plan should be reviewed and updated to safeguard and to reflect the status of the N24 Waterford to Cahir Scheme and to account for liaison requirements with the N24 Project Team.
- In accordance with National Development Plan investment objectives, TII's priorities also relate to safeguarding the levels of safety and capacity of the existing strategic national road network in the area.
- Any 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 and be developed, subject to an appropriate evidence base, in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and the requirements of TII Publications.

- TII is not aware of any evidence base developed to support the identification of the Strategic Employment Site at Ballingarrane to address the requirements of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). It is considered critical that this issue is addressed by the Council prior to finalising the Local Area Plan.
- Section 6.4 of the Draft Local Transport Plan, Future Road Reservations (Measures R19 & R20) in Table 6-05 and Figure 6-21 that combine to link the Ard Gaoithe Business Park (Cashel Road) to the N24 Cahir Road Roundabout should be reviewed cognisant of policy and safety requirements in accordance with official policy set out in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). Such confirmation should be reflected in the Draft LTP prior to finalisation.

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 140.

4. MAINTAINING THE STRATEGIC CAPACITY AND SAFETY OF THE NATIONAL ROAD NETWORK

TII outlined a number of specific policy areas for consideration in drafting the Local Area Plan in the Authority’s initial submission on pre-draft plan consultation. The following reiterates TII’s initial recommendations;

Section 3 of the DoECLG Spatial Planning and National Roads Guidelines outline key considerations relating to the development management function of the planning authority in relation to national roads.

TII requests that the Council give due consideration to reflecting the requirements of Section 3 of the DoECLG Spatial Planning and National Roads Guidelines in the Local Area Plan prior to finalisation, in particular;

i. TII Publications (Standards) and Road Safety

TII has referenced the application of appropriate TII Publications Standards above for inclusion in the Local Area Plan. In addition, the Road Safety Authority’s Road Safety Strategy, 2021 – 2030, builds on existing road safety interventions, but reframes the way in which road safety is viewed and managed in the community. It addresses all elements of the road transport system in an integrated way with the aim of ensuring collision energy levels are below what would cause fatal or serious injury.

A specific provision of TII Publications relates to the requirement for the submission of Road Safety Audits (RSA) for any development proposals that result in a permanent change to the layout of a national road (refer to TII Publications GE-STY-01024 Road Safety Audit).

TII Recommendation

- The Council is requested to reference TII Publications and the requirement for RSA in the Draft Local Area Plan relating to development proposals with implications for the national road network.

ii. Traffic and Transport Assessment (TTA)

TII recommends that planning applications for significant development proposals should be accompanied with TTA to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with other relevant developments on the road network. Guidance in relation to TTA is given in the “Traffic Management Guidelines”. To assist with TTA, TII has prepared the Traffic and Transport Assessment Guidelines (2014), which are available at www.tii.ie and could be referenced in the Draft Plan as appropriate guidance. The Guidelines also include recommendations on the requirement for sub-threshold traffic and transport assessments.

TII Recommendation

- The Council is requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Local Area Plan relating to development proposals with implications for the national road network. Thresholds advised in the TII Traffic & Transport Assessment Guidelines (2014), including sub-threshold TTA requirements, relate specifically to development proposals affecting national roads.

iii. Signage

TII has issued the Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011). The purpose of this document is to outline TII's policy on the provision of tourist and leisure information signs on national primary and national secondary roads in Ireland.

With respect to the Local Area Plan, the Planning Authority is also referred to Section 3.8 of the DoECLG's Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads.

TII Recommendation

- TII welcomes that Objective 6F of the Draft Local Area Plan sets out the Council objective to control the proliferation of non-road traffic signage on and adjacent to national roads and recommends reference to the DoECLG Guidelines in the Objective in addition to TII's Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).

iv. Safeguarding national road drainage regimes

TII would welcome consideration being given to including a new objective associated with safeguarding investment in the national road network relating to protection of national road drainage regimes. Significant improvements to the national road network have been overseen by the 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.

TII Recommendation

- Having regard to the extensive national road network in Tipperary, TII would welcome consideration of a new Objective included in the Local Area Plan outlining that;

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

v. Renewable Energy and Grid Connection

For all renewable energy developments requiring grid connection to the national grid, TII recommends that an assessment of all alternatives to grid connection routing should be assessed. It is considered inappropriate to only consider utilising the national road as a grid connection route when alternatives are available.

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.

TII Recommendation

- TII would welcome consideration being given to including an objective in the Local Area Plan, in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection cable routing should seek to utilise available alternatives, as opposed to being placed along the strategic national road network contrary to the provisions of official policy

vi. Noise

Official policy requires that development proposals identify and implement noise mitigation measures when introducing noise sensitive uses in the environs of existing and planned national roads, where such mitigation is 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.

TII Recommendation

- The Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Local Area Plan.

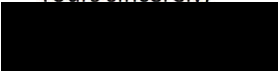
vii. Other Matters

In relation to Greenway proposals, consultation with the Councils own internal project and/or design staff is recommended.

Conclusion

The Authority respectfully requests that the foregoing observations are taken into consideration by the Council prior to the adoption of the Clonmel Local Area Plan, 2024 – 2030.

Yours sincerely,

A black rectangular box redacting the signature of Michael McCormack.

Michael McCormack
Senior Land Use Planner