



Planning Department
Tipperary County Council
Limerick Road
Nenagh
Co Tipperary

On-line submission portal; <https://consultations.tipperarycoco.ie/>

Dáta | Date
4 September, 2023

Ár dTag | Our Ref.
TII23-124126

Re: Draft Nenagh Local Area Plan, 2023 – 2029

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the Draft Nenagh 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 Nenagh.

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 M7, national primary road, to the south of the Local Area Plan area and integral to the accessibility of Nenagh is a strategic national road and is included as part of the EU Trans-European Transport Networks (TEN-T). The 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). Additionally, the N52, national secondary road, within the Local Area Plan area provides important inter and intra-regional access.

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.

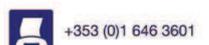
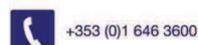
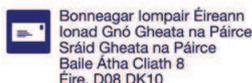
Taking account of these factors, TII has reviewed the Draft Nenagh Local Area Plan, 2024 – 2030, and accompanying Local Transport Plan in the context of official policy provisions and Regional Policy Objectives. The following observations elaborate on the above points and are provided for the Councils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

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.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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TII Recommendation

TII welcomes that Section 6.5 of the Draft Local Area Plan and related Policy 6.7 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

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

- Figure 6.11 indicates segregated active travel measures along the N52 west and north of Nenagh, and
- Figure 6.12 shows an indicative location of a Bus Stop on the N52 on the Borrisokane Road at a location where a 100kph speed limit applies.

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).

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 particular, the provision of a new bus stop on a national road at a location where a 100kph speed limit applies requires careful consideration. Such an approach is not in the interests of road user safety and new bus stop locations are generally encouraged to site off the high-speed national road network.

TII recommends early consultation with the NTA and the Council prior to advancing any proposals in this regard to ensure road safety considerations are reflected in all stages of decision making and appropriate TII Publications safety and design standards are applied.

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

Employment Lands at Gortlandroe

Section 4.2 of the Draft Local Area Plan addresses Nenagh Strategic Employment Areas and identifies three strategic employment locations in the Local Area Plan area; Lisbunny, Stereame and Gortlandroe. There is extensive greenfield employment lands proposed adjacent to the existing Gortlandroe Industrial Park which are in the vicinity of the N52, strategic national road.

TII does acknowledge that the associated text in the Local Transport Plan (Section 6.2) confirms that these lands will have access to Conlan's Road which is a non-national road and is also supported by proposed active travel measures outlined in the Local Transport Plan.

Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities advises that particular care is required in the 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. It is a requirement that planning authorities must make sure that such development is consistent with planning policies and can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding 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.

TII is not aware of any evidence base developed to address the requirements of the DoECLG Guidelines in relation to the lands at Gortlandroe and recommends that in any decision to zone the subject lands for inclusion in the Local Area Plan, the foregoing provisions of official policy are addressed.

TII Recommendation

- In accordance with National Development Plan investment objectives, TII's priorities 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 to accommodate planned development 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.

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 Nenagh Local Area Plan, 2023 - 2029.

Yours sincerely,



Michael McCormack
Senior Land Use Planner