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Ár dTag | Our Ref.
TII23-124127

Re: Draft Thurles Local Area Plan, 2023 – 2029

Dear Sir/Madam,

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

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 M8, national primary road, to the east of the Local Area Plan area and integral to the accessibility of Thurles is a strategic national road and is included as part of the EU Trans-European Transport Networks (TEN-T). Additionally, the N62 and N75, national secondary roads, within the Local Area Plan area provide 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 Thurles 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.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.

TII Recommendation

TII welcomes that Section 6.5 of the Draft Local Area Plan and related Policy 6.9 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 6.1 indicates segregated active travel measures along the N62 north and south of Thurles, with those to the south extending outside the reduced 50 – 60kph urban speed limit area into a location where a 100kph applies, and,
- Section 6.5 of the LTP outlines proposed Road Measures including LTP Measure (R29) Eastern Town Bypass which connects both national roads (N62 and N75);
- Figure 6.19 indicates the extent of a proposed 30kph reduced town centre speed limit (TII acknowledges that the accompanying footnote confirms that the introduction of a 30kph speed zone would need to follow the requirements of the ‘The Guidelines for Setting and Managing Speed Limits in Ireland’).

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 relation to the proposed 30kph reduced town centre speed limit measure included in the Draft LTP, TII acknowledges that the accompanying footnote confirms that the introduction of a 30kph speed zone would need to follow the requirements of the ‘The Guidelines for Setting and Managing Speed Limits in Ireland’. TII welcomes this conformation.

In the interests of clarification, the N62 Thurles Bypass Scheme is not a TII funded national road scheme. The Scheme, as outlined in the Draft LTP documentation will connect the N62 to the north of the town with the N62 to the south of the town via a junction with the N75 to the east side of Thurles.

TII advises that schemes proposed at a local level impacting the national road network shall be progressed in accordance with TII Project Management Guidelines and TII Publications design standards. In addition, where additional connectivity is proposed to a national road, the Council shall demonstrate compliance with the requirements of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Notwithstanding the foregoing, the Council will also be aware that funding of schemes which are not identified as NDP national road investment commitments is not a matter for TII.

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

Section 6.0 Transport and Connectivity

Two measures discussed in the above observations relating to the Draft Local Transport Plan are reflected in the Draft Local Area Plan. Policy 6.6 of the Draft LAP outlines support for the Thurles Bypass and Section 6.3 of the Draft LAP reiterates proposals for a 30kph speed limit zone within the central area of the town.

In relation to such proposals, TII's position is set out in Section 2, above.

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 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 acknowledges that the Draft LTP confirms that the introduction of a 30kph speed zone would need to follow the requirements of the 'The Guidelines for Setting and Managing Speed Limits in Ireland'

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 6G 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 Thurles Local Area Plan, 2024 – 2030.

Yours sincerely,



Michael McCormack
Senior Land Use Planner