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

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Ár dTag | Our Ref.  
TII24-129272

**Re: Draft Carrick on Suir and Environs Local Area Plan, 2025 – 2031**

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the Draft Carrick on Suir Local Area Plan, 2025 – 2031. 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 Sustainable Transport Plan in Appendix 2 and, in combination, provide an integrated local sustainable planning and transport framework for Carrick on Suir.

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 Local Area Plan area is an important strategic national road and provides important regional and inter-regional connectivity within and through the Southern Region, Tipperary, Carrick on Suir and the Carrick on Suir 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 Carrick on Suir and Environs Local Area Plan, 2025 – 2031, and accompanying Sustainable 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).

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
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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 6.9 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.

In the interests of clarification and consistency with official policy and to aid applicants for development proposals impacting national roads, TII respectfully suggests the following wording amendment to Policy 6.9 for the Councils consideration;

#### **Policy 6.9**

*'Safeguard the N24 and require new development proposals on or affecting national roads within the Plan area to have regard to national, regional and local policies and guidelines as set out in Section 6.5. 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'.*

**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 the Sustainable Transport Plan 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 Sustainable Transport Plan.

Having regard to the extent of the national road network in and adjoining the Draft Local Area Plan area, TII acknowledges the clarification provided in Section 5.2.1 of the Sustainable Transport Plan outlining that *'proposed measures do not encroach on the strategic national road network'*.

Notwithstanding the above, the N24, national primary road, through the Local Area Plan area remains an important strategic national road and provides important regional and inter-regional connectivity within and through the Southern Region, Tipperary, Carrick on Suir and the Carrick on Suir Environs. Therefore, TII would welcome the following inclusions in the Sustainable Transport Plan;

### **TII Recommendation**

- In Section 2.1 'Strategic Policy Plans' it is noted that reference to the National Sustainable Mobility Policy is included in Section 2.1.4. TII would similarly welcome a reference to the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) within Section 2.1 as it outlines official Government policy concerning development impacting national roads, such as the N24 within the Plan area.
- In Section 2.3 'Guidance Documents' reference to the Design Manual for Urban Roads and Streets (DMURS) is included in Section 2.3.2. The Council will also be aware of complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084). In addition, the Council will be aware that for all works to a national road it remains the requirement that a Design Report is completed and submitted for works impacting 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).

- TII would also welcome Policy 6.3 of the Local Area Plan updated to reflect the requirement to apply TII Publications to works to national roads in the urban area, complementary to DMURS.
- The Council is recommended to also consider inclusion of reference to the National Cycle Network Plan (DoT, 2023) in the Sustainable Transport Plan and to consult with the Councils greenway and active travel teams to ensure relevant projects are identified for inclusion in the Local Area Plan prior to finalisation.

**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 6.4.1 of the Draft Local Area Plan and associated policies and objectives.

Notwithstanding, in TII's opinion, clarification is required in relation to zoning objective proposals impacting the NDP N24 Waterford to Cahir Scheme, in the interests of consistency. TII recommends the following;

Section 2.9 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) advise that development objectives, including the zoning of land, must not compromise the route selection process, particularly in circumstances where road scheme planning is underway and potential route corridors or upgrades have been identified and brought to the attention of the planning authority.

In that regard, although TII acknowledges the inclusion of Policy 6F and Objective 6B in the Local Area Plan, TII recommends against including zoning objectives in the Land Use Zoning map underlying the N24 Waterford to Cahir Scheme. TII is concerned that such a practice could create an undesirable precedent, represents an internal inconsistency in the Draft Plan and could unintentionally increase the cost of any lands required for implementing the Scheme contrary to the provisions of the DoECLG Ministerial Guidelines.

The Councils 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.

#### **ii. Proposed 'Town Environs' Zoning Objective**

TII notes the proposed 'Town Environs' zoning objective to the east and west of Carrick on Suir which adjoins the N24, national primary road, at a location where TII's records indicate a 100kph speed limit applies. Section 5.1.2 of the Draft Local Area Plan and Policy 5.3 outline that new single dwellings may be facilitated in the 'Town Environs' zoned area subject to limited circumstances and on a case-by-case basis. The zoning matrix also indicates uses that may be facilitated in the 'Town Environs' zoning designation.

The Council will be aware that direct access to a national road outside where a reduced urban 50 – 60kph speed limit applies directly conflicts with official policy included in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Therefore, TII recommends the inclusion in the Draft Plan of an appropriate cross reference with Policy 6.9 of the Draft Local Area Plan and Policy 12 – 4 of the adopted County Development Plan, 2022 – 2028, which would provide guidance to future developers/applicants at the earliest stages of project development in relation to proposed development applications in the 'Town Environs' designated lands with the potential to impact the national road network contrary to the provisions of official policy.

#### **TII Recommendation**

- TII recommends against including zoning objectives in the Land Use Zoning map underlying the N24 Waterford to Cahir Scheme in the event that such a practice could create an undesirable precedent, represent an internal inconsistency in the Draft Plan and could unintentionally increase the cost of any

lands required for implementing the Scheme contrary to the provisions of the DoECLG Ministerial Guidelines.

- TII recommends the inclusion of an appropriate cross reference with Policy 6.9 of the Draft Local Area Plan and Policy 12 – 4 of the adopted County Development Plan, 2022 – 2028, in the Draft Plan which would provide guidance to future developers/applicants at the earliest stages of project development in relation to proposed development applications in the ‘Town Environs’ designated lands with the potential to impact the national road network contrary to the provisions of official policy.

**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**

- TII acknowledges the 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 included in Section 6.5 of the Draft Plan.

##### **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](http://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**

- TII acknowledges the reference to the TII Traffic & Transport Assessment Guidelines (2014) which relates to development proposals with implications for the national road network included in Section 6.5 of the Draft Plan. 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 welcomes 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 utilise the national road as a grid connection route when alternatives are available.

The Councils will be aware that Section 12.4.1.1 'Accelerate Renewable Electricity Generation' of the Climate Action Plan 2024 (CAP24) outlines the objective of reaching 80% of electricity demand from renewable sources by 2030 through a range of measures, including; 'All relevant public bodies will carry out their functions in a manner which supports the achievement of the renewable electricity targets, including, but not limited to, the use of road and rail infrastructure to provide a route for grid infrastructure where this is the optimal solution'.

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.

#### **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 except where such routing represents the 'optimal solution' in accordance with CAP24.

#### **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 Carrick on Suir and Environs Local Area Plan, 2025 – 2031.

Yours sincerely,



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Michael McCormack  
Senior Land Use Planner