

Planning Department
Leitrim County Council
Áras an Chonate
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Co. Leitrim
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By email; cdp@leitrimcoco.ie

Dáta | Date
17 November, 2022

Ár dTag | Our Ref.
TII22-120690

Re. Proposed Material Alterations to the Draft Leitrim County Development Plan, 2023 – 2029

Dear Sir/Madam,

TII acknowledges receipt of referral of Proposed Material Alterations to the Draft Leitrim County Development Plan, 2023 - 2029. The Authority acknowledges and welcomes the Proposed Material Alterations arising from consideration of the Authority's initial submission on the Draft Plan. In relation to other Proposed Material Alterations on display, TII outlines the following observations for the Councils consideration;

Proposed Amendment MA 3

TII notes that Proposed Amendment MA 3 outlines that Objective CS OBJ 9 relating to the proposed Joint Local Area Plan for Carrick on Shannon will be informed by a Local Transport Plan (LTP) prepared in consultation with the NTA. TII also acknowledges Objective MSSM OBJ 1 of the Draft Plan identifies that the LTP will be prepared in collaboration with stakeholders including TII.

Recommendation

- TII welcomes consultation on the Carrick on Shannon Local Area Plan and Local Transport Plan.
- In TII's opinion, preparation of the LTP should be informed by the TII/NTA Area Based Transport Assessment (ABTA) Guidance. TII also welcomes that the findings and recommendations of the LTP will inform the Local Area Plan Review process ensuring coordination of land use and transport planning.

Proposed Amendment MA 59

TII welcomes the removal of the 'exceptional circumstances' proposal to the east of Carrick on Shannon accessing the N4, national primary road, and the considerations outlined in the Chief Executive Report in that regard. TII confirms continued availability to assist the Council in the development of 'exceptional circumstances' cases in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines.

The Proposed Amendment also considers 'exceptional circumstances' provisions for Irish Water Projects accessing the national road network at locations outside reduced 50 – 60kph urban speed limit locations. TII acknowledges that the text of the proposed amendment confirms that such projects may be applicable to the provisions of 'exceptional circumstances' and welcomes the identification that they will be subject to engagement between Irish Water, TII and Leitrim County Council.

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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Taking account of statutory guidance, TII considers that insufficient information is available in both the 'Irish Water Capital Investment Plan, 2020 – 2024' and the text of Proposed Amendment MA 59 to;

1. Identify the specific sites to which 'exceptional circumstances' might apply, and
2. To elaborate on how such proposals may conform to the criteria and requirements set out under 'Developments of National and Regional Strategic Importance' in Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

Having regard to the foregoing, TII recommends that further engagement between the Council and Irish Water would explore the foregoing considerations, consistent with the requirements set out in Section 2.6 of the DoECLG Guidelines and the requirement for a plan-led and evidence-based approach to the identification of 'exceptional circumstances' where a less restrictive approach to the control of access to national roads may be applied.

Considerations will also need to reflect implications for national road scheme planning in Leitrim and schemes being progressed in accordance with National Development Plan, 2021 – 2030, investment objectives.

In developing any case for 'exceptional circumstances', the critical need to manage national road assets and associated junctions as well as future projects in accordance with official Government policy is required.

Recommendation

- To address the requirements of Section 2.6 of the DoECLG Guidelines and the requirement for a plan-led approach, TII respectfully suggests that the text of the Proposed Amendment is updated to include the additional text in *green italics* below;

'Public water and wastewater projects will be progressed in the county over the coming years which may require the creation of additional access points or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/hr apply. These projects are necessary to meet strategic growth and environmental objectives in local, regional and national planning policy. Such projects may also be applicable to the provisions of 'exceptional circumstances' and subject to engagement between Irish Water, TII and Leitrim County Council. Where such projects are identified for agreement, they shall be plan-led and included in the Development Plan in accordance with the requirements of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).'

CONCLUSION

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 County Development Plan and national roads and TII would welcome future consultation on local area plan and local transport planning undertaken by the Council where there may be implications for the strategic national road network.

It is respectfully requested that the above observations are taken into consideration prior to the adoption of the Leitrim County Development Plan, 2023 – 2029.

Yours sincerely,



Michael McCormack
Senior Land Use Planner