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Dáta | Date
8 April, 2022

Ár dTag | Our Ref.
TII22-117235

Re. Draft Leitrim County Development Plan, 2023 – 2029

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on the Draft Leitrim County Development Plan, 2023 – 2029, and the opportunity to comment on emerging policies and development objectives scheduled in the Draft Plan.

TII's observations, provided in the following submission, seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy. To that effect TII provides the following comments for the Council's consideration.

1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE

1.1 Core Strategy

Leitrim County Council in collaboration with TII has overseen significant investment in the County improving strategic national road connectivity to and within the County and Region including to critical international gateways.

As outlined in observations made by TII in relation to the County Development Plan pre-draft consultation stage, the Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. 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). The TEN-T Regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport, co-ordinated, to achieve integrated and intermodal long-distance travel routes across Europe.

Specifically, in relation to the EU TEN-T Network, Section 8.3 'Working Together for Economic Advantage' of the **National Planning Framework (NPF)** advises that there will be a focus on improving and protecting key transport corridors, including the TEN-T Network by, inter alia;

- *Improving and protecting the key transport corridors such as the TEN-T network and strategic function of the Dublin to Belfast road network from unnecessary development and sprawl.*

The N4, N15 and N16, national primary roads, are all part of the EU TEN-T Comprehensive Network and provide important regional and inter-regional connectivity within and through Leitrim, including critical international connectivity via port and airport connections.

Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan, 2021 – 2030, sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users.

Government policy also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the National Planning Framework. This requirement is further reflected in the publication of the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

Having regard to the foregoing official policy provisions and the requirement to safeguard the existing and planned strategic national road network, TII would welcome the inclusion of new text in Chapter 2 'Core Strategy' of the Draft Plan.

The new text requested would be associated with improvement to the national road network in accordance with National Development Plan investment objectives and safeguarding the existing networks in accordance with the provisions of official policy outlined in the NPF, NDP and Section 28 Ministerial Guidelines; 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

The Authority considers that the Core Strategy would benefit from reflecting such strategic objectives. The strategic national road network is critical to supporting and enhancing regional economic growth and providing regional accessibility and enhanced accessibility to international gateways. Relevant Core Strategy 'Core Strategy Policies and Objectives' for inclusion in Section 2.11 of the Development Plan related to the proposed and existing strategic national road network can be summarised as;

- a) to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements, and
- b) to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

Recommendation

TII would welcome consideration by the Council of the following:

- Inclusion as new Core Strategy Objectives in Chapter 2 'Core Strategy' strategic objectives to reflect the official policy requirements, summarised as;
 - to maintain the strategic function, capacity and safety of the national roads network, and
 - to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

1.2 Local Area Plans/Local Transport Plans/Area Based Transport Assessment

Draft Plan Objective CS OBJ 9 confirms the Councils commitment to undertake a Joint Local Area Plan for Carrick-on-Shannon/Cortober in conjunction with Roscommon County Council. Objective MSSM OBJ 1 commits to undertaking a Local Transport Plan (LTP), including consultation with relevant stakeholders, for Carrick-on-Shannon and supported by Objective TRAN OBJ 13 outlining that the LTP process will be guided by the NTA/TII document 'Area Based Transport Assessment'.

TII welcomes the commitment to future local area planning and undertaking a LTP for Carrick-on-Shannon. TII agrees that the preparation of a LTP should be integral to the forward planning/local area plan process and undertaken in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Guidance.

TII also notes that Objective MSSM OBJ 1 confirms that the LTP will be utilised to establish specific modal share targets for the town to be incorporated into the future Carrick-on-Shannon Local Area Plan. TII considers that

findings and recommendations of the LTP process, undertaken in accordance with ABTA, should be incorporated into the preparation of the Carrick-on-Shannon Joint Local Area Plans.

Recommendation

TII would welcome consideration by the Council of the following:

- TII would support and welcome consultation on the preparation of the Joint Carrick-on-Shannon Local Area Plan and the Local Transport Plan.
- TII welcomes that the Draft Plan confirms that LTP will be prepared in accordance with the NTA/TII ABTA Guidance.
- Findings and recommendations of the Local Transport Plan, undertaken in accordance with ABTA, should be incorporated into the preparation of the statutory Joint Carrick-on-Shannon Local Area Plan.

2. SECTION 28 GUIDANCE: SPATIAL PLANNING AND NATIONAL ROADS GUIDELINES

2.1 Access to National Roads

Section 8.11.2.4 Access to National Roads of the Draft Development Plan outlines the Council approach to the assessment of development proposals and access to national roads. Policy TRAN POL 2 outlines the Council approach relating to access to national roads; it is noted that the Proposed Policy makes reference to the term 'inappropriate' new access points. In TII's opinion, use of the term 'inappropriate' in the context of Policy TRAN POL 2 does not reflect the provisions of official policy included in Section 2.5 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

TII respectfully suggests the following wording amendment for the consideration of the Council to ensure adherence to Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines (2012);

TRAN POL 2;

'To protect the national road network from ~~inappropriate~~ new access points and the intensification of existing accesses onto or adjacent to national roads in accordance with the requirements of Section 2.5 of Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG,2012) to maintain traffic capacity, minimize traffic hazard and protect and maximize public investment in such roads'.

Similarly, within Section 3.17 'Rural Settlement Strategy' of the Draft Plan, the Council include proposed policy RUR SET POL 9 which states; *'To restrict new accesses to serve individual residential developments onto National Roads and the R280 save for exceptional circumstances where alternative access cannot be achieved'.*

TII considers that the inclusion of text that refers to the application of 'exceptional circumstances where alternative access cannot be achieved' is in conflict with the Spatial Planning and National Roads Guidelines (DoECLG, 2012). Government policy included in Section 2.6 of the DoECLG Guidelines does not accommodate individual residential development accessing national primary roads and TII recommends that this provision of the Draft Plan requires revision in the interests of clarity and adherence to the provisions of official policy. TII respectfully suggests the following wording amendment to Policy RUR SET POL 9 for the consideration of the Council;

RUR SET POL 9;

'To restrict new accesses to serve individual residential developments onto National Roads and the R280 ~~save for exceptional circumstances where alternative access cannot be achieved~~'.

Recommendation

TII would welcome consideration by the Council of the following text amendments to ensure adherence to the provisions of Section 28 Ministerial Guidance 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012):

TRAN POL 2;

'To protect the national road network from ~~inappropriate~~ new access points and the intensification of existing accesses onto or adjacent to national roads in accordance with the requirements of Section 2.5 of Spatial Planning and National Roads Guidelines for Planning Authorities (DECLG,2012) to maintain traffic capacity, minimize traffic hazard and protect and maximize public investment in such roads'.

RUR SET POL 9;

To restrict new accesses to serve individual residential developments onto National Roads and the R280 save for exceptional circumstances where alternative access cannot be achieved’.

2.2 ‘Exceptional Circumstances’

Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines provide a mechanism for the Council to agree cases of ‘exceptional circumstances’ where a less restrictive approach to the control of development accessing national roads can be applied subject to a plan-led evidence-based approach.

It is noted that the Draft Plan includes Section 8.11.2.5 ‘Exceptional Circumstances’ and outlines the Councils intention to *‘develop and agree a policy for access off the national roads in conjunction with Transport Infrastructure Ireland... To facilitate a significant economic development off the N4 National Primary Road east of Carrick-on-Shannon’*. The Draft Plan outlines that the development is of regional strategic importance and is included in the Regional Spatial and Economic Strategy.

Related to the above, it is also noted that Policy TRAN POL 5 outlines the Councils policy to avoid the creation of any additional access point from new development/intensification of traffic from existing entrances onto national roads outside the 60kph speed limit, except at the N4 east of Carrick-on-Shannon to facilitate a significant economic development. A Map extract is included with Policy TRAN POL 5.

Objective CARRICK OBJ 6 also refers and outlines the Objective to *‘pursue the sustainable development of a new regionally significant opportunity site to the east of Carrick-on-Shannon and contiguous to the existing land use zoning envelope for use as a data centre or alternative regionally scaled employment use following the undertaking of a feasibility study. Access would potentially be from a National Primary Road (outside of reduced speed limit zone) and careful consideration of options is required. This will require inclusion of an exceptional circumstance for a new entrance off the N4 to be agreed with the TII in accordance with the Spatial Planning and National Roads Guidelines’*.

TII’s records indicate that a 100kph speed limit applies to the N4, national primary road, at the location of the proposed access. The N4 is a strategic national road, part of the EU TEN-T Comprehensive Network and provides important strategic linkages between Dublin and the north-west including providing connectivity to international port and airport locations.

The Council will also be aware that the proposed ‘exceptional circumstance’ case is within the Constraints Study Area for the N4 Carrick-on-Shannon to Dromod national road scheme which is included as an Objective of the National Development Plan, 2021 – 2030.

The National Development Plan, 2021 – 2030, outlines the key sectoral priority of maintaining Ireland’s existing national road network to a robust and safe standard for users. This position is further reflected in the publication of the National Investment Framework for Transport in Ireland. The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities also emphasis the critical importance of ensuring high standards of road safety on national roads which is addressed by managing access and intensification of access to national roads and guarding against a proliferation of roadside development accessing national roads to which speed limits greater than 50 – 60kmh apply.

The Council will be aware that Section 2.9 of the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) clearly requires 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.

Inappropriate zoning and development objectives can also significantly increase the cost of land to be acquired for national road scheme planning, can make the road scheme uneconomic and are, therefore, not in the broader public interests of achieving value for public money.

TII considers that implications for the proposed National Development Plan Objective: N4 Carrick-on-Shannon to Dromod Scheme requires clarification as part of any evidence base developed to establish a case for 'exceptional circumstances'. Pending this clarification, TII considers it inappropriate to include the proposed 'exceptional circumstances' case as currently presented in the Draft Plan.

The location of the proposed 'exceptional circumstances' access point directly adjoins the existing N4, national road, at a location where a 100kph speed limit applies. Pending the delivery of the N4 Carrick-on-Shannon to Dromod national road scheme, it is critical that the safety, capacity and strategic function of the existing N4, national road, is safeguarded in accordance with official Government policy objectives especially with regards to access to the North-West.

In this context, the Council recently published a Part VIII for a Regional Sports Centre in Carrick-on-Shannon (Part VIII Ref. 22-C-02 refers) and the Transport Assessment that accompanied the Part VIII indicated capacity constraints at the N4/Attirory Roundabout Junction in future year development scenarios. Furthermore, it does not appear that the Transport Assessment undertaken for the Part VIII identified the potential future year trip generation from a 'regionally scaled' employment site such as that subject to the proposed 'exceptional circumstances' case.

TII advises that no consultation has been undertaken in relation to this proposed 'exceptional circumstances' case for inclusion in the Development Plan. TII is also unaware of any evidence base developed in support of the proposal to address the requirements of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines, including implications for the planned N4 Carrick-on-Shannon to Dromod Scheme and measures to safeguard the strategic function of the existing N4, national primary road.

TII is of the opinion that including the proposed 'exceptional circumstances' in the Development Plan in the form currently presented and in advance of undertaking an evidence-based analysis is inappropriate and in conflict with the provisions of Section 2.6 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

Recommendation

TII would welcome consideration by the Council of the following:

- Including the proposed 'exceptional circumstances' in the Development Plan on the N4 in the form currently presented in advance of undertaking an evidence-based analysis is considered inappropriate and in conflict with the provisions of Section 2.6 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).
- TII is available to assist the Council in the development of proposals for consideration as 'exceptional circumstances' cases in accordance with the provisions of the DoECLG Guidelines.

2.3 Rural Settlement Strategy

Section 3.17 of the Draft Plan sets out the Councils Rural Settlement Strategy and includes the Council policy position in relation to a range of rural housing activities including replacement housing, extensions, etc. Having regard to the extensive and largely rural nature of the national road network in Leitrim, it is considered that such development proposals have the potential to result in a demand for access to strategic national roads.

Therefore, in the interests of clarity, TII would welcome a cross reference included in Section 3.17 of the Draft Plan referring to Policy TRAN POL 2 and the policy to avoid the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60 km/h apply.

TII is of the opinion that such a cross reference would provide clarification and early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network in the area and clearly identify, at an early stage, any policy conflicts related to access to national roads for applicants to consider.

The National Development Plan, 2021 – 2030, outlines the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. This position is further reflected in the publication of the National Investment Framework for Transport in Ireland. The DoECLG Spatial Planning and National Roads

Guidelines also emphasize the critical importance of ensuring high standards of road safety on national roads which is addressed by managing access and intensification of access to national roads and guarding against a proliferation of roadside development accessing national roads to which speed limits greater than 50 – 60kmh apply.

Recommendation

TII would welcome consideration by the Council of the following:

- Include a cross reference in Section 3.17 of the Draft Plan referring to Policy TRAN POL 2 in the interests of providing clarification and early assistance to applicants in the preparation of any rural housing planning application where there may be implications for the strategic national road network in the area.

2.4 Rural Economic Development Strategy

Section 10.4 'Rural Economy' of the Draft Plan and subsequent sections outline the Councils policies and objectives related to Commercial Rural Development and the different rural development typologies. TII acknowledges that rural areas play a key role in driving the economy and the Authority supports the need to sustain these rural communities in County Leitrim.

It is noted that a number of policies associated with economic and rural development understandably seek to facilitate enterprise and employment proposals in a rural environment. For example, Policy RUR ECON POL 3 seeks to accommodate proposals for new employment and enterprise development that may emerge and for which there are strong locational factors that do not apply to the same extent elsewhere. Policy AGR POL 2 seeks to support and facilitate farm diversification including enterprise creation opportunities. Section 10.7 of the Draft Plan addresses Extractive Industry and Building Materials Production.

Related to the foregoing Policy Objectives and the acknowledged support for the development of the rural economy in Leitrim, TII would welcome inclusion in the Draft Plan, in the interests of clarification and as an advisory to potential applicants for development in rural areas, of the requirement to adhere to the provisions of official policy on access to national roads in relation to rural development typologies that may seek access to the national road network at variance with the requirements of official policy.

Reference to the provisions of official policy concerning development management and access to national roads would provide early assistance to applicants in the preparation of any planning application where there may be implications for the strategic national road network in the area and clearly identify, at an early stage, any policy conflicts related to access to national roads for applicants to consider.

TII provides the following suggested text for inclusion as a new Policy in Section 10.4 of the Draft Plan;

'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. This provision applies to all categories of development'.

Recommendation

TII would welcome consideration by the Council of the following:

- Having regard to the location and potential nature of developments facilitated by policies promoting rural enterprise and economic development, TII requests that an appropriate policy objective is included in Section 10.4 of the Draft Plan prior to adoption. Such an approach would assist in safeguarding the safety and operation of the national road network and would provide clarity for future applicants/developers, etc. in relation to relevant development proposals with the potential to impact the national road network.

Suggested Policy wording;

'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. This provision applies to all categories of development'.

2.5 Retailing

TII acknowledges the support for town centre development and the application of the sequential approach to retail development outlined in Section 4.13 of the Draft Plan.

In the interests of clarity, TII would welcome a new policy objective included in the Development Plan to reference the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.

Recommendation

TII would welcome consideration by the Council of the following:

- The inclusion of a new policy objective included in the Development Plan to include the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.

3. TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

TII acknowledges that Objective TRAN OBJ 3 of the Draft Plan includes support for the delivery of national road scheme planning included in the National Development Plan, 2021 – 2030, for delivery in County Leitrim;

- **N4 Carrick on Shannon to Dromod**

TII also welcomes that Section 8.11.2.3 and Objective TRAN OBJ 2 safeguard proposed road schemes from development encroachment which could prejudice their delivery. It is considered critical that corridors for national road schemes are safeguarded pending the delivery of any scheme; Section 2.3 and Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines refers.

In addition, it is noted that Policy ILU POL 6 outlines a Corridor and Route Selection Process to be applied to new transport infrastructure projects. The Council will be aware that all national road projects are required to be progressed in accordance with statutory processes and TII Publications, including the Project Management Guidelines and Project Appraisal Guidelines. Applying an additional undefined process to national road schemes may create risks for schemes provided for in the National Development Plan and create unintended consequences.

In the interests of clarity and to avoid any ambiguity in relation to the delivery of the National Development Plan national road investment objectives, TII would not support the additional requirements of Policy ILU POL 6 of the Draft Plan relating to Corridor and Route Selection Process being applied in addition to processes already applied to national road scheme planning. TII would welcome this clarification provided in the Plan prior to adoption.

Associated with the delivery of national road improvements is the requirement to adhere to relevant environmental regulations, including Appropriate Assessment. It is acknowledged that the Draft Plan addresses this requirement in Policy NH POL 2 and TII welcomes that the proposed Policy acknowledge the provisions of both Article 6(3) and Article 6(4) of the Habitats Directive.

The Council 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.

The Authority's priorities in relation to national roads in County Leitrim, including the above Major Scheme, also includes the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date.

Any other improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements and, as indicated above, their implementation may be subject to budgetary constraints, prioritisation and the adequacy of the funding resource available to the Authority.

Recommendation

TII would welcome consideration by the Council of the following:

- TII would welcome clarification in the Draft Plan confirming that Policy ILU POL 6 will not be applied to national road schemes in the interests of avoiding risk to proposed national road schemes, in the interests of clarity and in the interests of adherence to the provisions of official policy.
- In all instances, national road improvement schemes should be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.

4. OTHER TRANSPORT PROPOSALS

4.1 Integration of Land Use Planning and Transport

TII welcomes that Section 8.4 of the Draft Plan considers Integration of Land Use Planning and Transportation. As outlined above, TII welcomes the commitment to undertaking a Local Transport Plan for Carrick-on-Shannon in the Draft Plan and considers the alignment of Local Area Plan preparation with undertaking LTP's an integral element of successful integrated land use and transport planning.

Section 13.16 of the Draft Plan advises that in respect of road design issues within towns and villages, the Council will have regard to the 'Design Manual for Urban Roads and Streets' (DMURS) (DTTS and DECLG, 2013, updated 2019).

In addition to the requirements relating to DMURS, the Council will be aware of complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084).

The TII Publications Standard describes the requirements that shall be implemented on National Roads on the approaches to towns and villages in terms of the provision of traffic calming measures and pedestrian crossings. National Roads within 60km/h zones can traverse many areas with very different characteristics such as low-density residential areas, industrial areas, mixed use neighbourhoods and town and village centres. This requires different design solutions within each of these different contexts, in the interests of the safety of all road users.

Recommendation

TII would welcome consideration by the Council of the following:

- The incorporation of reference to TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in the Development Plan in association with reference to DMURS, in the interests of providing clarification that such a standard will be applied, in the interests of road user safety, on national roads.

5. ANCILLARY POLICY PROVISIONS AND ISSUES

5.1 Service Areas

TII notes that Service Stations are addressed in Section 13.13.1 of the Draft Plan, however, it is unclear that a policy approach to service areas and roadside facilities on national roads has been addressed.

TII would welcome the Draft Plan including the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads prior to adoption.

The planning authority will also be aware that Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines indicates the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions and also addresses road side service facilities on non-motorway national roads and their junctions.

Recommendation

TII would welcome consideration by the Council of the following:

- The inclusion of a policy position reflecting the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads in the Draft Plan and the requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.

5.2 Safeguarding National Road Drainage Regimes

TII would welcome consideration being given to including a new objective associated with Section 9.9 of the Draft Plan relating to the protection of national road drainage regimes.

Significant improvements to the national road network have been overseen by Leitrim 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.

Recommendation

TII would welcome consideration by the Council of the following:

- Having regard to the extensive national road network in Leitrim, TII would welcome a new Objective included in the Development Plan outlining that;
'The capacity and efficiency of the national road network drainage regimes in County Leitrim will be safeguarded for national road drainage purposes'.

5.3 Grid Connection Routing and Renewable Energy Development

Section 12.6.1 of the Draft Plan addresses the Councils County Renewable Energy Strategy and sets out the Councils policies related to Renewable Energy in subsequent sections.

TII appreciates that the availability of a safe, secure, and reliable supply of electricity is an essential requirement for Ireland's current and future economic wellbeing. The greening of energy generation via the transition from conventional fossil fuel power generation to sustainable forms of renewable energy supply such as wind and solar power is an essential development if Ireland is to meet its obligations to cut greenhouse gas emissions as we move towards a zero-carbon economy and TII fully supports Government policy in this regard.

In TII's experience, the dispersed nature of renewable energy resources generally has the potential to result in interactions, to varying degrees, with the strategic national road network that require careful consideration and management.

In accordance with the National Planning Framework National Strategic Outcome no. 2 'Enhanced Regional Accessibility', there is a requirement to maintain the strategic capacity and safety of the national road network. This requirement is further reflected in the National Development Plan, the publication of the National Investment Framework for Transport in Ireland and also the existing Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

The dispersed and rural nature of the location of renewable energy resources requires the development of associated grid connection development. Grid connections accommodated on national roads have 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 can arise to on-line national road improvements and upgrades also.

In that regard and having regard to the requirement to maintain the strategic capacity and safety of the national road network in accordance with official policy provisions, TII recommends that grid connection proposals should be developed which safeguard the strategic function of the national road network by utilising available alternatives. TII would welcome this matter being considered as a policy provision in the Development Plan prior to adoption.

Recommendation

TII would welcome consideration by the Council of the following:

- TII would welcome an objective included in the adopted Development Plan in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives.

5.4 Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) and TII Publications (Standards)

TII welcomes the inclusion of proposed Policy TRAN POL 3 and the requirement for TTA and RSA in the Draft Plan. Section 13.16.1 and Section 13.16.2 both also refer.

It is also noted that Section 13.16.4 of the Draft Plan includes reference to NRA TD 41-42 of the NRA Design Manual for Roads and Bridges (DMRB).

The Council will be aware that the DMRB has been superseded and all relevant design standards for national roads are now included in TII Publications. The Council may consider a review of the text included in Section 13.16.1 that refers to the NRA to ensure updated referencing to TII and TII Publications is included in the Draft Plan.

Recommendation

- The DMRB has been superseded and all relevant design standards for national roads are now included in TII Publications. The Council may consider a review of the text included in Section 13.16.1 that refers to the NRA to ensure updated referencing to TII and TII Publications is included in the Draft Plan.

5.5 Noise

It is noted that Noise is addressed in Section 9.12 of the Draft Plan. Government policy requires that development proposals identify and implement noise mitigation measures, where warranted, for noise sensitive development proposed in the vicinity of existing or proposed national roads; TII welcomes that this requirement is addressed in the Draft Plan.

Recommendation

TII would welcome consideration by the Council of the following:

- Development proposals should identify and implement noise mitigation measures, where warranted, for development proposed in the vicinity of existing or proposed national roads. 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.

5.6 Signage

TII notes Sections 13.13.5 to 13.13.8 of the Draft Plan addresses signage. Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines addresses signage and national roads. In addition, TII has published 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.

While it is noted that the above Sections of the Draft Plan address Signage standards, TII recommends that where there are implications for the national roads network, regard should be had to Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines and TII's Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).

TII would welcome this element of the Draft Plan updated to reflect the foregoing provisions of official policy and TII's policy statement.

Recommendation

TII would welcome consideration by the Council of the following:

- It is requested that the Draft Plan is updated to incorporate reference to Section 3.8 of the DoECLG Spatial Planning and National Roads Guidelines and TII's Policy on the Provision of Tourist & Leisure Signage on National Roads (March 2011).

6. SETTLEMENT PLANS/DEVELOPMENT STRATEGIES

Volume 2 of the Draft Development Plan includes the Settlement Plans and relevant zoning and development objectives for the settlements in County Leitrim. TII provides the following observations for the Councils consideration;

6.1 Aligning Development Objectives and Speed Limits on National Roads

The Authority acknowledges and welcomes the close alignment of development plan zoning and settlement boundary designations with existing speed limits on the national road network contained in Draft Plan Volume 2; Section 2.11 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities refers.

However, it appears that two proposed zoning/development proposals have the potential to conflict with Government policy as they are proposed to adjoin the national road network outside locations where reduced 50 – 60kph urban speed limits apply. In the interests of consistency with the application of official policy, TII recommends review of the settlement boundaries identified for the following;

- Manorhamilton which includes the development Objective MHN 23 *'Relocate the Fire Station to the site identified with a 'Utility' land use zoning objective on the Sligo Road'* and the associated zoning designation. TII's records indicate that an 80kph speed limit applies to the N16, national primary road at this location.
- Glenfarne (Brockagh Lower) (Map no. 38) which includes a proposed 'General' zoning on the N16 to the east side of the settlement which is within a 100kph speed limit zone according to TII's records. Although it is noted that an alternative local road access may be available and should be clarified.

TII recommends a review of the proposed designations to ensure development objectives are appropriately aligned with national road speed limits in the interests of road user safety and the application of official policy.

Recommendation

In accordance with Government policy, it is critical that the national road network is safeguarded to fulfil its strategic economic function and to provide a robust and safe network for road users and communities served. Accordingly, TII requests a review of development zoning designations/objectives in the settlement plans identified above;

- Manorhamilton; proposed 'Utility' zoning on the N16 Sligo Road,
- Glenfarne (Brockagh Lower) proposed 'General' zoning on the N16 to the border.

CONCLUSION

The Authority acknowledges the significant undertaking for the Council in drafting a Development Plan and the requirement to consider and address a multiplicity of factors in developing a sustainable spatial planning framework not just issues relating to national roads.

The Authority acknowledges and welcomes the alignment in the Draft Plan with official policy concerning development planning and development management and national roads and compliments the Council in this regard. Notwithstanding, there are a number of specific interactions between land use policy, development objectives and the strategic national road network in Leitrim included in the Draft Plan that the Authority considers require review prior to the adoption of the Development Plan.

Such review would ensure consistency with official policy and safeguard the strategic function of the national road network in the area, in particular;

- Inclusion of Core Strategy Objectives to reflect official policy requirements including maintaining the strategic function, capacity, and safety of the national roads network and to ensure quality levels of service, safety, accessibility, and connectivity to transport users.
- There is critical road safety and policy provisions that are required to be addressed in relation to the inclusion of the proposed 'exceptional circumstances' case in Section 8.11.2.5 of the Draft Plan and related objectives, including full demonstration of compliance with the DoECLG Guidelines. TII considers it inappropriate and contrary to the provisions of the Section 28 Ministerial Guidelines 'Spatial Planning and

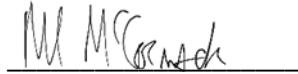
National Roads Guidelines for Planning Authorities' (DoECLG, 2012) to include the proposal in the Development Plan in its current format.

- TII considers that Settlement Plan zoning proposals and development objectives identified in the above submission should be reviewed to ensure consistency with the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).
- An objective to be included in the adopted Development Plan in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives.

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