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Dáta | Date
26 January, 2024

Ár dTag | Our Ref.
TII23-125646

Re: Draft Roscommon Town Local Area Plan, 2024 – 2030

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the Draft Roscommon Town Local Area Plan, 2024 – 2030, and provides the following observations for the Councils consideration.

1. INTEGRATING LAND USE AND TRANSPORT POLICY

Project Ireland 2040 | 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. Government 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.

The N60, N61 and N63, national routes, provide important regional and inter-regional connectivity within and through Roscommon Town and Environs and County Roscommon. The routes are important strategic national roads and give access to regional and national markets and link with other strategic national roads providing onward connection to strategic airport and port locations with access to international markets.

It is of particular importance that policies and objectives are drafted for inclusion in the Draft Local Area Plan which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve economic competitiveness and regional accessibility by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

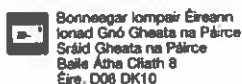
There is a critical need to manage these assets in accordance with official Government policy as outlined in DoECLG Spatial Planning and National Road Guidelines for Planning Authorities, the TEN – T Regulation (EU) No 1315/2013, the National Planning Framework, the National Development Plan and the National Investment Framework for Transport in Ireland.

The Northern and Western Regional Assembly (NWRA) Regional Spatial and Economic Strategy (RSES) also includes Regional Policy Objectives concerning national roads. Regional Policy Objective RPO 6.5 outlines;

The capacity and safety of the region's land transport networks will be managed and enhanced to ensure their optimal use, thus giving effect to National Strategic Outcome No.2 and maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.

To give effect to the above objectives Regional Policy Objective (RPO) 6.27 outlines the RSES support for the collaborative preparation of Local Transport Plans based on Area Based Transport Assessment (ABTA) Guidance.

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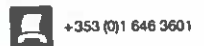
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RPO 6.27 further states that Local Transport Plans will inform the urban area plans, development plans, local area plans and other planning framework documents prepared and specifically identifies the preparation of a Local Transport Plan for Roscommon Town.

The ABTA Guidance advises that it is critical that an ABTA is not carried out in isolation and to ensure that movement and accessibility of all forms, across all modes of transport, is considered as a key component in the development of areas at a local level.

Although Section 7.2 of the Draft Local Area Plan identifies that the effective integration of land use and transport planning is a key element of the plan, it does not appear, having reviewed the Draft Local Area Plan and associated appendices, that a Local Transport Plan has been prepared to inform the Local Area Plan development and movement objectives as required by RPO 6.27. TII would recommend that a Local Transport Plan be undertaken to inform the Local Area Plan and to support the Sustainable Transport Policy Objectives included in Section 7.4 prior to finalising the Local Area Plan.

TII Recommendation

- The Draft Local Area Plan should be supported by the preparation of a Local Transport Plan prepared in accordance with the TII/NTA Area Based Transport Assessment Guidance (TII Publications Reference PE-PDV-02046) as a means to identify urban sustainable mobility measures complementary to safeguarding the strategic function and safety of the national road network in the area in accordance with Government objectives.
- Local Transport Plan measures should be developed and effect to encourage sustainable mobility complementary to safeguarding the function and levels of safety of the strategic national road network in the area in accordance with Government objectives.
- The Local Transport Plan should acknowledge that works to national roads are required to adhere to TII Publications (Standards), including the submission of Design Reports where required. Policy Objective RN 29 of the Draft Local Area Plan outlines that new development proposals are required to be designed to comply with the Design Manual for Urban Roads and Streets. However, given the extensive national road network in the area, TII would also recommend that Policy Objective RN 29 should confirm that where national roads are impacted, designs shall also consider complementary TII Publications requirements.

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2, RPO 6.5 and RPO 6.27.

2. DEVELOPMENT STRATEGY AND NATIONAL ROADS

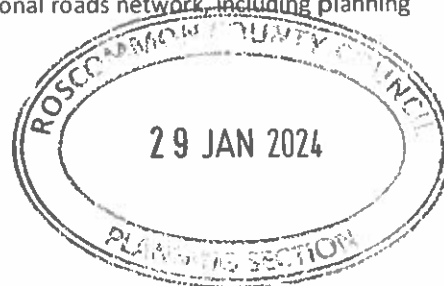
Regional Policy Objective 6.5/NPO 74/NSO 2 Enhanced Regional Accessibility

RPO 6.5 of the NWRA RSES outlines that the capacity and safety of the region's land transport networks will be managed and enhanced to ensure their optimal use, thus giving effect to NSO 2 and maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements.

RPO 6.5 gives effect to the associated commentary in the NWRA RSES which states that improving and maintaining the assets of all national roads is critical and the efficiency, capacity and safety of the existing national road network within the region must be maintained, including the requirement to safeguard the strategic links into urban centres identified as key economic drivers in the region. Such an approach conforms to requirements set out in the NPF, NDP and NIFTI of maintaining the strategic capacity and safety of the national roads network to a robust and safe standard for users.

Recommendation

- TII would welcome the Draft Plan incorporating an amendment to reflect the foregoing national objectives in Section 3.2 'Strategic Objectives' and in Chapter 7 'Infrastructure and Transport' and which can be summarised by the following two proposed objectives;
 - a) to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements, in the local plan area, and



- b) to ensure that the existing transport networks in the local area plan area, which have been greatly enhanced, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 6.5.

3. SPECIFIC LOCAL AREA PLAN OBJECTIVES

TII notes the extensive 'Strategic Industrial/Enterprise Zones' zoning designation included in the Draft Local Area Plan adjoining and in the vicinity of the strategic national road network. TII would welcome provision included in the Local Area Plan identifying the requirement for appropriate transport assessment of the development of the subject lands, including the assessment of cumulative impacts.

The Authority 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 Traffic and Transport Assessment is given in the "Traffic Management Guidelines". To assist with Traffic and Transport Assessment in relation to national roads, TII has prepared the Traffic and Transport Assessment Guidelines (2014) which are available at www.tii.ie. The Guidelines also include recommendations on the requirement for sub-threshold traffic and transport assessments.

TII respectfully requests that the Draft Plan is reviewed to include an Objective confirming the requirement for Traffic and Transport Assessment in accordance with the TII Traffic & Transport Assessment Guidelines (2014) to support development of the 'Strategic Industrial/Enterprise Zones' in particular and in relation to development proposals impacting the national road network in the area more generally.

Also, in relation to the range of uses that are 'Open for Consideration' in the 'Strategic Industrial/Enterprise Zones' and in the interests of clarity, TII would welcome a new policy objective included in the Local Area 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, which has not been referenced in the Draft Plan.

Reason: To ensure conformance with official policy provisions included in NPO 74/NSO 2 and RPO 6.5.

4. MAINTAINING THE STRATEGIC CAPACITY AND SAFETY OF THE NATIONAL ROAD NETWORK

In addition to the foregoing official policy and regional objectives, 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)

As noted above, Policy Objective RN 29 of the Draft Local Area Plan identifies the Design Manual for Urban Roads and Streets (DMURS) as an applicable design standard. However, TII would highlight that any works to the national road network and national road junctions will continue to require adherence to TII Publications (Standards).

While DMURS principles will apply in the urban area generally, the Council will also be aware that TII has published complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084).

This 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.



Recommendation

- TII requests acknowledgment of complementary TII Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' (TII Publications DN-GEO-03084) in relation to design standards to be applied to national roads and national road junctions in the Local Area Plan area. The Local Area Plan should acknowledge that works to national roads in urban areas are required to adhere to TII Publications (Standards) as well as the Design Manual for Roads and Streets (DMURS).
- As well as the foregoing, the Council will be aware that 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).

ii. Traffic and Transport Assessment (TTA) and Road Safety

As referenced above, TII respectfully requests that the Draft Plan is reviewed to include an Objective confirming the requirement for Traffic and Transport Assessment in accordance with the TII Traffic & Transport Assessment Guidelines (2014) to support development of the 'Strategic Industrial/Enterprise Zones' in particular and in relation to development proposals impacting the national road network in the area more generally.

In addition, Road Safety Audit (RSA) involves the evaluation of road schemes during design, construction and early operation to identify potential hazards to all road users. RSA is to be carried out on all new national road infrastructure projects and on any schemes/proposal which results in a permanent change to the layout of a national road (refer to TII Publications GE-STY-01024 Road Safety Audit).

Recommendation

- TII requests that the Draft Plan is reviewed to include an Objective confirming the requirement for Traffic and Transport Assessment in accordance with the TII Traffic & Transport Assessment Guidelines (2014) and for Road Safety Audit requirements in relation to relevant changes to the national road network.

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 Draft 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.

Recommendation

- The Authority would welcome the provisions of the TII Policy and the DoECLG Guidelines incorporated into the Draft Local Area Plan.

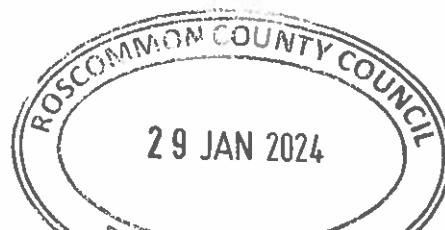
iv. Safeguarding national road drainage regimes

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.

Recommendation

- Having regard to the extensive national road network in Roscommon, 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 Roscommon 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 a full assessment of all route alternatives to grid connection takes place, including alternatives to public road, where appropriate. It is not considered optimal to utilise the national road as a grid connection route when viable 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, upgrades and safety works to existing national roads.

Recommendation

- TII would welcome consideration being given to including an objective in the Local Area Plan, in relation to supporting renewable energy and in relation to safeguarding the national road network, indicating that grid connection cable routing should seek to utilise alternatives, where available, as opposed to being placed along the strategic national road network.

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.

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 Council's 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 Roscommon Local Area Plan, 2024 – 2030.

Yours sincerely,



Michael McCormack
Senior Land Use Planner

