

Monaghan County Council
Forward Planning Team
Planning Section
County Offices
The Glen
Monaghan



Dáta | Date
21 May, 2018

Ár dTag | Our Ref.
TII18-101116

Bhur dTag | Your Ref.

Re. Draft Monaghan County Development Plan, 2019 – 2025

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) welcomes consultation on the Draft Monaghan County Development Plan, 2019 – 2025, and the opportunity to comment on emerging policies and development objectives scheduled in the Draft Plan.

The Council will be aware that TII was established in August, 2015. TII is the operational name of the National Roads Authority and the Roads Act, 2015, sets out the legal structure for the transfer of the Railway Procurement Agency (RPA) functions, etc., to the Authority. TII's observations, provided in the following submission, seek to address issues concerning the safety, capacity and strategic function of the national road network in accordance with TII's statutory function 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

As outlined in observations made by TII in relation to the County Development Plan pre-draft consultation stage undertaken by the Council, 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 in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe.

The N2 Dublin to NI Border route through Monaghan is identified as part of the TEN-T Comprehensive Network which has repercussions and action requirements for policies and objectives to be included in the County Development Plan. This route is a strategic national road and an important inter-urban transport corridor linking strategic regional centres, identified in the National Planning Framework, and giving access to regional and international markets, including through strategic airport and port locations as well as linking with other strategic national roads. The Council will also be aware that the N12, national primary road, and N53 and N54, national secondary roads, are also important links within, and to and from the County.

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.

The critical need to manage national road assets in accordance with national policy is outlined in the Strategic Investment Framework For Land Transport (DTTAS, 2014), Smarter Travel (DTTAS, 2009) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

In addition, the recently published Project 2040 | National Planning Framework identifies maintaining the strategic capacity and safety of the national roads network as part of National Strategic Outcome 2. The National Development Plan outlines as an investment priority, ensuring 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, accessibility and connectivity to transport users.

TII would welcome consideration by the Council of including as a Core Strategy Objective in the Development Plan the foregoing strategic objectives; a) to maintain the strategic capacity and safety of the national roads network and b) to safeguard the investment in national roads.

Notwithstanding the foregoing, TII notes and welcomes the acknowledgement that the N2 is part of the TEN-T Network included in Section 7.8 of the Draft Plan and also welcomes reference to the provisions of the DoECLG Spatial Planning and National Roads Guidelines in the associated policies.

Within the context of the above, the Authority requests that the following recommendations are considered and addressed prior to the adoption of the Development Plan;

2. DoECLG SPATIAL PLANNING AND NATIONAL ROADS GUIDELINES

a) It is noted that Policy NRP1 of the Draft Plan outlines the Councils policy to protect the traffic carrying capacity of national roads, etc., by avoiding the creation of new access points or the generation of increased traffic from existing accesses onto the N2, N53, N54 and N12 outside the 60kph speed limit. Such a policy approach is welcome and is, in the opinion of TII, consistent with the provisions of the DoECLG Spatial Planning and National Roads Guidelines. It is noted that this provision is also reflected in Objective RPO 8; Section 9 Strategic Objectives for Settlement Plans.

TII also notes the provision within Policy NRP2 that in exceptional circumstances, developments of national and regional strategic importance may be considered where the locations concerned have specific characteristics that make them particularly suitable for the development proposed subject to such development being provided for through the Local Area Plan or Development Plan making process in consultation with TII and ongoing commitment to road safety for all road users.

While TII welcomes this clarification in the Draft Plan, the Council will be aware that any proposals for 'exceptional circumstances' for incorporation in subsequent local area plans should be prepared in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines. As advised in TII observations on pre-draft consultation, TII is available to assist the Council in the development of proposals for consideration as 'exceptional circumstances' cases.

TII notes that 'exceptional circumstances' are also referred to in Policy NRP3 and the repetition included in Policy NRP3 appears to conflict/contradict Policy NRP4, TII recommends a review of the respective policies in the interests of clarification and consistency, and adherence to the provisions of official policy.

b) Related to the above point TII notes that there are a number of existing 'legacy' locations on the existing national road network that are not identified for 'exceptional circumstances' in the Draft Plan although there may be a potential to make a case for the strategic important employment provision of the sites. Consideration could also be given to projects and schemes of national and/or regional importance. However, TII acknowledges it is a matter for the Council to develop cases for agreement.

c) It is noted that a number of policies associated with economic development understandably also seek to facilitate proposals in a rural environment, where warranted, Policy INDP1, Policy INDP6 and INDP8 refer.

Having regard to the location and potential nature of developments facilitated by such policies, TII recommends that an appropriate cross reference with Policy NRP1 to safeguard the safety and operation of the national road network and to restrict access outside the urban speed limit zones for towns and villages would provide added transparency to the Draft Plan and ensure clarity for future applicants/developments.

In addition to the above, an appropriate cross reference with Policy NRP1 would provide added transparency to the Draft Plan and ensure clarity for future developments in particular, in relation to other forms of development that similarly may be facilitated in a rural area and have the potential to directly impact the strategic national road network. In that regard, the Council may consider the inclusion of such a cross reference in relation to Section 4.6 and Policy AGRP2, Section 4.7 and Policy TMP12, Section 4.8 and Policy ERP12, Section 4.9 and associated policies, and Section 4.10.

TII would welcome consideration being given to including an appropriate cross reference to Policy NRP1 in the foregoing sections of the Draft Plan in the interests of clarity and to assist future applicants/developments.

Similarly, an appropriate cross reference could be considered for inclusion in Section 15 Development Management Standards of the Draft Plan addressing development management standards for the development types identified in the foregoing in the interests of consistency.

d) Development at National Road Junctions

The DoECLG Spatial Planning and National Roads Guidelines require that planning authorities exercise particular care in their assessment and management of development proposals in the Development Plan relating to the zoning of locations at or close to junctions on the national road network where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

Proposals for development and land use zoning designations at national road interchanges and junctions should be considered and be prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

The Council will be aware of passed collaboration with TII on access strategies for development lands in Monaghan Town at Tullygrimes and at Tullyhirm, Annahagh and Knockaconny. TII is available to continue to liaise with the Executive of the Council on developing an agreed approach to access. In circumstances where agreements are made, TII recommends their inclusion in the Development Plan, prior to adoption, in the interests of clarity.

e) There are a number of instances in Section 15.27 where reference is made to the National Roads Authority's Design Manual for Roads and Bridges. However, the Council will be aware that the DMRB has been superseded and all relevant standards are now detailed in TII Publications. The Authority recommends that relevant references are updated.

3. TRANSPORT PLANNING AND NATIONAL ROAD SCHEMES

National Road Projects

As you are aware the Authority is developing/progressing road schemes and improvements within County Monaghan, details of which should be considered for incorporation into the review of the County Development Plan. The following schemes are included as Schemes in Pre-Appraisal/Early Planning in Project Ireland 2040|National Development Plan, 2018 – 2027;

- N2 Clontibret to Border
- N2 Ardee to South of Castleblayney

TII welcomes that the above schemes are identified and included in Table 7.2 of the Draft Plan and that route corridor protection is included in Policy TP04. In relation to any mapped schemes included in Section 7.8 of the

Draft Plan, TII recommends consultation with the Road Design Section to ensure the most up-to-date and relevant scheme information is included in the Development Plan prior to adoption.

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 Monaghan, including the above Major Schemes, also includes the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date.

The Authority notes the inclusion of schemes in Table 7.2 of the Draft Plan which are in addition to the schemes included in the National Development Plan, identified above, and advises that while such 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, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements. Similarly, a number of roads proposals identified in Table 7.5 of the Draft Plan relating to the five key towns and other road proposals included in the individual Settlement Plans interface with the strategic national road network. While proposals should be developed complementary to safeguarding the strategic function of the national road network, proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.

While TII notes that a Corridor and Route Selection Process has been identified in Section 7.13 of the Draft Plan, 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. TII would welcome this clarification in the Draft Plan prior to adoption in the interests of avoiding risk to projects, in the interests of clarification and in the interests of adherence to the provisions of official policy.

4. OTHER SPECIFIC POLICIES AND OBJECTIVES

a) Retailing

TII acknowledges the support for concentrating retail uses in established town centres and the application of the sequential test in Section 4.4 of the Draft Plan and associated policies. In addition, TII notes and welcomes Policy RTP5 which includes 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.

b) Traffic and Transport Assessment (TTA)

As outlined in TII's submission on pre-draft consultation for the Draft Development Plan, the Authority recommends that planning applications for significant development proposals should be accompanied with TTA and RSA 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, the Authority has updated the Traffic and Transport Assessment Guidelines (2014), which are available at www.tii.ie. While it is noted that Policy TP01 of the Draft Plan refers to the TTA Guidelines in a policy context, no other policy or objective of the Draft identifies the requirement for TTA.

The Council are requested to reference the TII Traffic & Transport Assessment Guidelines (2014) in the Draft Development 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.

TII in association with the NTA has also recently published, via TII Publications, Area Based Transport Assessment (ABTA) Guidance Notes. TII Publication Number PE-PDV-02046 refers. The Council may find the Guidance Note a useful resource.

c) Road Safety

Similar to above, TII's initial observations on pre-draft consultation outlined the requirement for Road Safety Audit (RSA) and Road Safety Impact Assessment (RSIA).

- **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).
- **Road Safety Impact Assessment (RSIA)** is described in the EU Directive on Road Infrastructure Safety Management (EU RISM) 2008/96/EC as a strategic comparative analysis of the impact of a new road, or for substantial modifications to an existing road, on the safety performance of the road network (refer to TII Publications PE-PMG-02001 Road Safety Impact Assessment).

RSIA is a separate process to RSA. While RSA examines the safety aspects within a scheme, RSIA considers the safety impact of a scheme on the surrounding road network. RSIA and RSA both work to improve the safety performance of new roads and existing roads that require modifications due to projects or proposals. Both have consequences for the design and layout of any project. It is requested that the Draft Plan is reviewed to provide for the requirements of RSA and RSIA prior to adoption.

d) Signage

TII notes that Signage is addressed in Policy NRP5 and in Section 15.5 of the Draft Plan. While the Draft Plan makes reference to the DoECLG Spatial Planning and National Roads Guidelines in relation to signage proposals, the Council may also be aware that TII has published the Policy on the Provision of Tourism and Leisure Signage on National Roads (2011).

TII would welcome a review of signage policies in the Draft Plan and consideration being given to including reference to the Policy on the Provision of Tourism and Leisure Signage on National Roads (2011).

Notwithstanding this, TII welcomes reference to the DoECLG Spatial Planning and National Roads Guidelines in this context and acknowledges that Section 3.8 of the Guidelines indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads.

e) Noise

TII acknowledges that Noise is addressed in Section 8.39 of the Draft Plan. While Section 8.39 addresses introducing noise generating uses in proximity to noise sensitive uses, the Council will be aware of the need to avoid adverse impacts when introducing noise sensitive uses in proximity to existing and future national roads. This matter is addressed in Section 3.7 of the DoECLG Spatial Planning and National Roads Guidelines. It is a requirement that development proposals include mitigation, where warranted, and the Guidelines clearly require that the costs of implementing mitigation measures, in such circumstances, should be borne by the developer. The Authority will not be responsible for the provision of additional noise mitigation.

TII respectfully requests that the Council consider the above matter for inclusion in the County Development Plan, prior to adoption.

f) Service Areas

The planning authority will 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.

The Authority would welcome the provisions of the DoECLG Guidelines reflected in the County Development Plan, prior to adoption, in the interests of safety and adherence to the provisions of official policy.

In the interests of clarity, TII has issued the TII Policy on Service Areas (August, 2014). Section 1.4 of the Policy outlines the roles of the Authority and planning authorities in relation to the provision of service areas.

g) Other Plans/Strategies

The reference to other subordinate plans and strategies supported by the Draft Development Plan is noted, for example, the requirement for Local Area Action Plans outlined in Section 9.16 of the Draft Plan and LUTS, etc. In relation to the preparation of such plans and strategies, TII requests that where there are implications for the safe and efficient operation of the national road network, existing and proposed, that appropriate consultation with TII would occur.

5. SETTLEMENT PLANS/DEVELOPMENT STRATEGIES

a) Monaghan Town Settlement Plan

The Authority notes the new road proposals outlined in Section 10.8.1 of the Draft Plan and indicated on Map MDP1. Most of the road proposals have an interface with the national road network. While the Authority acknowledges that it is beneficial for the Council to schedule work programmes that it is proposed to deliver at a local level, the Authority requests that any route improvements undertaken would be complementary to safeguarding the strategic function of existing national roads and be consistent with and not undermine or impact negatively on proposed, identified strategic national road schemes.

With specific reference to the proposed Industrial Link Road from N12 Armagh Road at Knockaconny to N2 Dublin Road at Annagh Roundabout and the significant extent of zoned development lands at this location, the Council will be aware of previous discussions with TII in relation to the subject lands and access proposals. In that context, TII acknowledges the intention of the planning authority was to undertake a LUTS for Monaghan and develop access and delivery proposals for the lands concerned and the associated link road. TII considers that the preparation of a LUTS is an essential requirement in that context.

TII would welcome an update on developments in this regard. The zoning objectives at this location included in the current Draft Plan still include proposed development lands along the N12, national primary road, at a location where a 100kph speed limit applies, and accessing via the Annagh Roundabout on the N2, also at a location where a 100kph speed limit applies, contrary to the provisions of official policy. TII considers that access proposals for the subject lands should be reviewed and clarified prior to the adoption of the Development Plan and ensure consistency with the provisions of official policy.

Similar to above, lands are zoned for Industry/Enterprise/Employment on the N54, national secondary road, at Tullygrimes, Monaghan, extending into a location where a 100kph speed limit applies. Access proposals previously discussed provided for access to the subject lands from a point within the reduced 50 – 60kph urban speed limit area to ensure adherence to the provisions of official policy. TII recommends that access proposals to the subject lands should be clarified in the Development Plan prior to adoption.

b) Carrickmacross Settlement Plan

The Authority notes that the proposed Carrickmacross Settlement Plan introduces a significant quantum of newly zoned Industry/Enterprise/Employment lands to the east of the N2, north of the town and adjoining the northern N2 junction. Policy CMO5 to promote lands to the east of Carrickmacross Bypass for strategic industrial development with potential for significant employment generation also refers to the lands concerned.

Although access proposals to the subject lands are not detailed in the Settlement Plan, the Council will be aware of the provisions of the DoECLG Spatial Planning and National Roads Guidelines which require that planning authorities must exercise particular care in their assessment of development plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.

The zoning proposals are removed from the remainder of zoning in the town and do not appear to represent a logical sequential development of the town. Such an approach has the potential to result in significant reliance

on the national road network for accessibility and therefore, is considered, inconsistent with safeguarding the strategic function of the national road network.

The proposed zoning objective has the potential to directly impact the operation of the strategic national road network in the area. Therefore, it is a concern to the Authority that, it appears, no evidence base has been undertaken to demonstrate that accessibility, access proposals and additional traffic loading generated by such a zoning objective can be satisfactorily accommodated at this location on the N2 national road junction while safeguarding the strategic function of the network.

TII strongly recommends a review of the subject Industry/Enterprise/Employment zoning proposal to the north of the town, east of the N2, national primary road. There appears more favourable lands available to assist in consolidating the zoning envelop in Carrickmacross.

In relation to other proposed zoning proposals, TII acknowledges that these are primarily contained within the N2 Bypass. However, the Authority recommends that development proposals in proximity to the N2 junctions are appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the N2 and associated junctions. Proposals should consider the cumulative impact of development in the area and be subject to Traffic and Transport Assessment as appropriate.

c) Castleblayney Settlement Plan

The Authority notes that the land use designations pertaining to Castleblayney are all contained within the N2 Bypass, including the significant extensions to proposed Industry/Enterprise/Employment land use designations.

The Authority recommends that development proposals in proximity to the N2 junctions are appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the N2 and associated junctions. Proposals should consider the cumulative impact of development in the area and be subject to Traffic and Transport Assessment as appropriate.

In relation to the N53, it appears that limited zoning proposals may extend outside the 50-60kph speed limit location and it is recommended that access to the lands identified would be accommodated within the reduced urban speed limit area to ensure compliance with the provisions of official policy. Clarification of this matter in the Development Plan, prior to adoption, would be welcome.

Previous submissions made by TII on the Castleblayney Settlement Plan noted that direct access to the N2 was proposed from the Killycard Industrial Estate, which at the time was blocked and out of use. It is noted that a Part VIII proposal was approved in 2014. TII has no record of consultation on the Part VIII proposal. The Authority would welcome clarification on the use of the direct access to the N2, national primary road, and the lands to be served in the interests of safeguarding the strategic function of the N2 and adherence to the provisions of official policy.

d) Clones Settlement Plan

Although the Authority notes the extensive 'Industry/Enterprise/Employment' zoning designation adjoins the N54 to the north east of the town at a location where a 60kph applies, much of the subject lands adjoin the N54 where a 50kph speed limit applies. It is acknowledged that the Settlement Plan subjects the lands to a masterplan and TII requests that a coordinated access strategy, compliant with the provisions of the DoECLG Spatial Planning and National Roads Guidelines, is devised for the area and included in the Plan.

In addition, having regard to the extensive area of 'Industry/Enterprise/Employment' identified at this location adjoining the N54, the Authority recommends that development proposals are appropriately assessed to ascertain the implications of traffic generation on the safe and efficient operation of the N54. Proposals should consider the cumulative impact of development in the area when undertaking a Traffic and Transport Assessment.

e) Tier 4 and Tier 5 Settlements

Smithborough and Emyvale are two Tier 4 settlements situated on the national road network. It is noted that the proposed development limit identified for Smithborough extends to the east of the village alongside the N54 at

a location where a 100kph speed limit applies. The Authority requests that the Council review the proposed development limit or consider access requirements having regard to the provisions of the DoECLG Spatial Planning and National Roads Guidelines.

In addition, it is noted that the proposed development limit for Emyvale extends north along the N2 at a location where a 60kph speed limit pertains. In accordance with the provisions of the DoECLG Spatial Planning and National Road Guidelines, i.e. the plan may provide for a limited level of direct access to facilitate orderly urban development at locations where a 60kph speed limit applies, the Authority requests a review of the development boundary or the preparation of an access strategy to be included in the Plan.

The Council should also consider the implications for other Dispersed Rural Settlements, such as Tyholland on the N12, national primary road, that are situated on the national road network at locations where a 100kph speed limit applies, in the interests of road safety and to ensure adherence to the provisions of official policy.

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 generally positive 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 this there are a number of specific interactions between land use policy and development objectives included in the Draft Plan and the strategic national road network in County Monaghan, including in individual Settlement Plans, that the Authority considers require review prior to the adoption of the Development Plan to ensure consistency with official policy and in order to safeguard the strategic function of the national road network in the area.

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 Development Plan and national roads.

It is respectfully requested that the above observations are taken into consideration prior to the adoption of the Monaghan County Development Plan, 2019 – 2025.

Yours sincerely,



Michael McCormack
Senior Land Use Planner