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Offaly County Council  
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e.submission; [www.offaly.ie/occ\\_mini\\_websites/CDP/](http://www.offaly.ie/occ_mini_websites/CDP/)

Dáta | Date  
8 July, 2021

Ár dTag | Our Ref.  
TII21-113648

**Re. Proposed Material Alterations to the Draft Offaly County Development Plan, 2021 - 2027**

Dear Sir/Madam,

TII acknowledges receipt of referral of Proposed Material Alterations to the Draft Offaly County Development Plan, 2021 - 2027. The Authority welcomes the Proposed Material Alterations arising from consideration of the Authority's initial submission on the Draft Plan. In relation to other Proposed Material Alterations on display, TII outlines the following observations;

**1. Material Alteration Reference MA43**

TII notes Material Alteration Reference MA43 which relates to policies concerning the provision of rural housing in County Offaly. As outlined in TII's initial submission on the Draft County Development Plan, TII acknowledges and supports the need to sustain rural communities.

In relation to the Councils approach to the provision of rural housing in the open countryside included in Section 2.4.7 and associated policies in Section 2.5 of the Draft Plan, TII would welcome inclusion in this Section of the Development 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 in relation to development accessing national roads. An appropriate cross reference with Policy SMAP-19, Policy SMAP-20 and Policy SMAP-21 of the Development Plan would be welcome and is considered important early assistance to applicants in the preparation of any subsequent planning application where there may be implications for the strategic national road network in the area.

**Recommendation;**

TII would welcome consideration by the Council of the following:

- To include an appropriate cross reference with Policy SMAP-19, Policy SMAP-20 and Policy SMAP-21 of the Draft Plan with Section 2.4.7 and associated policies in Section 2.5 of the Draft Plan concerning the Councils approach to the provision of rural housing in the open countryside 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 in relation to development accessing national roads.

## **2. Material Alteration Reference MA60**

TII acknowledges the Council policy to support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/ distribution of a renewable energy focused generation across the major demand centres which is outlined for inclusion in the Development Plan by Material Alteration Reference MA 60.

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 recent publication of the Draft 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 arise to on-line national road improvements and upgrades also. The Council will be aware of such considerations which were assessed as part of Offaly County Council planning application ref. 18/230.

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 alternative available routes in the first instance. TII would welcome this matter being considered as a policy provision in the Development Plan prior to adoption either as an amendment to Proposed Material Alteration Reference MA60 or otherwise within the relevant policy section of the Plan.

### **Recommendation**

TII would welcome consideration by the Council of the following:

- Having regard to the above observations, TII would welcome an objective included in the adopted Development Plan in relation to renewable energy development grid connection proposals 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 alternative available routes.

## **3. Material Alteration Reference MA64**

TII acknowledges the support for the former peatlands industries and communities impacted by the cessation of peat harvesting in parts of Offaly and the closure of associated power stations. In terms of the range of actions and supports outlined in Material Alteration Reference 64, including, promotion of the appropriate re-use of some, former industrial peatlands and associated infrastructure / works sites with a focus on sustainable employment generation, community resilience, tourism facilities and amenities, TII outlined related observations in the Authority's initial submission on the Draft Plan.

In that regard, the Council will be aware of the significant interface between the counties peatland resources and the strategic national road network. Any future framework plan and associated initiatives and supports included in the Development Plan should have regard to the provisions of official policy relating to development

management and access to national roads set out in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012).

### Recommendation

TII would welcome consideration by the Council of the following:

- TII recommends that any future Peatlands Framework Plan and initiatives and supports associated with the after use of peatlands and associated works sites should have regard to the provisions of official policy relating to development management and access to national roads set out in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines’ (DoECLG, 2012). TII is available for consultation with the Council in relation to any future peatlands after use framework plan and initiatives and supports associated with the after use of peatlands and associated works sites.

#### 4. Material Alteration Reference MA187

TII welcomes the clarification provided in proposed Material Alteration Reference MA187 that the additional Corridor and Route Selection Process outlined in Section 8.5.4 of the Draft Plan will not apply to national roads having regard to the established statutory processes and guidance that such national road schemes must observe in the first instance.

Notwithstanding, TII considers that proposed Material Alteration Reference MA187 would benefit from additional clarification, for example, the text of the proposed Material Alteration makes reference to ‘TII Planning Guidelines’ which is inaccurate.

### Recommendation

TII would welcome consideration by the Council of the following:

- To amend the proposed text associated with proposed Material Alteration Reference MA187 as follows;

*‘The following Corridor and Route Selection Process will be undertaken for relevant new infrastructure, however this would not apply to national road schemes which are progressed in accordance with statutory processes and TII publications, including various TII Planning Guidelines for Assessment of Environmental Impacts under headings such as “Constraints Study”, “Route Corridor Selection” and “Environmental Impact Assessment:’.*

#### 5. Material Alteration Reference MA208

Similar to the above point in relation to Material Alteration Reference MA187, TII considers the text associated with Material Alteration Reference MA208 would benefit from additional clarification in relation to the approach to national road scheme planning, in particular, in relation to the text associated with the N52 national road improvement scheme. The proposed text amendment suggested below also ensures consistency with the approach of the Council outlined in proposed Material Alteration Reference MA187.

### Recommendation

TII would welcome consideration by the Council of the following:

- To amend the proposed text associated with proposed Material Alteration Reference MA208 as follows;

*‘N52: To support the construction of a road between Tullamore and Kilbeggan (Link Road) in accordance with National Development Plan investment objectives taking into account environmental sensitivities as identified in the SEA Environmental Report and the policies and objectives of the County Development Plan relating to sustainable mobility. Where feasibility is established, the Council will seek to pursue and / or facilitate the relevant project, subject to other provisions in the Plan, and in accordance with statutory processes and TII Publications subject to compliance with requirements of various TII Planning Guidelines for Assessment of Environmental Impacts under headings such as “Constraints Study”, “Route Corridor Selection” and “Environmental Impact Assessment” including section 8.5.4 Corridor and Route Selection Process.’.*

## **6. Material Alteration Reference MA210**

TII welcomes the proposed objective included in proposed Material Alteration Reference MA210 in the interest of safeguarding national road scheme planning in the County.

### **Recommendation**

TII would welcome consideration by the Council of the following:

- TII recommends adoption of the Material Alteration as proposed.

## **7. Material Alteration Reference MA263**

TII notes proposals to zone additional lands to the east side of the N52 opposite the Cappincur Industrial Estate outlined in proposed Material Alteration Reference MA263. The lands are in the vicinity of the N52 roundabout junction with local road L2025 (Ballinagar/Town Centre).

Section 2.7 of the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guide lines for Planning Authorities (DoECLG, 2012) advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads.

TII is not aware of any analysis undertaken by the Council to develop an evidence base, in accordance with the provisions of official policy, to establish potential implications for the strategic national road network in the area and to support the proposed zoning at this location.

It is unclear if the zoning proposal adjoining the national road network and associated junctions has been subject to appropriate transport assessment or transport modelling or development of appropriate mitigation measures. This approach would be a basic requirement for any evidence based approach to demonstrate that proposed trip generation can to be catered for, while protecting the strategic function of the national road network.

### **Recommendation**

TII would welcome consideration by the Council of the following:

- Section 2.7 of the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads.

The Proposed Material Alteration is not supported by the required evidence base and plan-led approach required by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

## **8. Material Alteration Reference MA266**

Similar to comments above in relation to Material Alteration Reference MA263, TII is not aware of any analysis undertaken by the Council to develop an evidence base, in accordance with the provisions of official policy, to establish potential implications for the strategic national road network in the area and to support the proposed zoning amendment at this location.

Notwithstanding the above comment, unlike Material Alteration Reference MA263 it is acknowledged that Material Alteration Reference MA266 relates to an alteration of an established 'Business Park' zoning objective.

However, given the extent of lands concerned, the proximity of the subject lands to the N52 roundabout junction with local road L2025 (Ballinagar/Town Centre) and taken in conjunction with other proposed development lands in the vicinity of the N52 national road junction, TII considers that an appropriate plan-led approach to the zoning of the subject lands should be promoted.

### **Recommendation**

TII would welcome consideration by the Council of the following:

- Section 2.7 of the Section 28 Ministerial Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) advise that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges/junction on national roads.

The Proposed Material Alteration is not supported by the required evidence base and plan-led approach required by Section 28 Ministerial Guidelines on Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). Such an approach would include appropriate transport assessment or transport modelling of the subject lands, the development of appropriate mitigation measures and consideration of the cumulative impact of the development of other lands in the vicinity of the N52/L2025 roundabout junction.

## **CONCLUSION**

As outlined above, TII acknowledges and welcomes proposed amendments to the Draft Plan that arise following the Council's consideration and assessment of TII's initial submission.

There also remains specific provisions of the Draft Plan of which the Authority requested review prior to adoption which are not subject to proposed amendment. The Authority's position in relation to these items remains as set out in TII's submission on the Draft Development Plan of 29 September, 2020, including;

- Core Strategy Objectives concerning maintaining the strategic function and capacity of the national road network to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.
- Proposals related to the Durrow Abbey Monastic Site accessing the N52, national road, and
- Masterplan exercises included in the Development Plan and associated Settlement Plans.

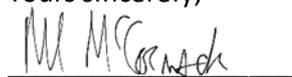
In relation to the Proposed Material Amendments on display, TII respectfully requests that the foregoing observations are taken into consideration by the Council prior to finalising the Development Plan. TII has identified a number of proposed amendments and provisions which, in TII's opinion, require review prior to adoption to ensure that the Development Plan provisions adhere to the provisions of official policy, in particular;

- Implications for the strategic national road network arising from renewable energy development grid connection proposals,
- Clarification in relation to text associated with Section 8.5.4 of the Draft Plan relating to the Corridor and Route Selection Process outlined,
- Settlement Plan zoning amendments in Tullamore in the vicinity of the N52/L2025 roundabout junction, individually and cumulatively.

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 Offaly County Development Plan, 2021 – 2027.

Yours sincerely,



Michael McCormack  
Senior Land Use Planner