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Roscommon County Council, Áras an Chontae, Roscommon, County Roscommon

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TII23-125685

RE: Joint Urban Area Plan for Athlone 2024 – 2030 Pre-draft Consultation

Dear Senior Executive Officers,

Transport Infrastructure Ireland (TII) welcomes notice of the commencement of the preparation of a Joint Urban Area Plan for Athlone (JUAP) by Westmeath and Roscommon County Councils.

TII's mission is to deliver transport infrastructure and services, which contribute to the quality of life for the people of Ireland and support the country's economic growth. TII safeguards the strategic function of National Roads to promote the safe and efficient operation of the national roads networks in accordance with Government policy. TII's also has a remit, designated by the Department of Transport, which includes the greenways and the development of a plan for an inter-urban cycle network as committed to recently published the National Cycle Network Plan (NCN).

Athlone is critically located in the State and on the national roads network. The town is traversed by the M/N6 into which the N55, N61 and N62 national secondary routes travel in the vicinity of Athlone. The national road network caters for Ireland's inter-urban and inter-regional transport requirements and gives access to regional and international markets through strategic airport and port locations. As part of this network, the M/N6 is a highly important national road. The M/N6 is identified as part of the TEN-T Comprehensive Network. In addition, the N55, N61 and N62 national secondary roads provide important regional and inter-regional connectivity within and through the Midlands. Significant Exchequer investment has been and continues to be made in relation to the national road network in the vicinity of Athlone. Following the opening of the Athlone Bridge Cycleway (Castle to the Marina), the authorities will be aware that Athlone in the NCN forms part of corridor no. 22 Galway to Athlone and corridor nos. 15, (Roscommon to Athlone), 16 (Athlone to Longford) and 19 (Athlone to Tullamore) and integrating with the Lough Ree and Grand Canal Greenways.

Taking account of the above, TII makes the following observations having regard to the *Strategic Issues Paper* for the preparation of the JUAP and having regard to the statement that the JUAP will review and replace *Athlone Town Development Plan 2014-2020* and *Monksland/Bellanamullia Local Area Plan 2016-2022*.

1.0 Managing Exchequer Investment and Statutory Guidance

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. 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. The Councils will be aware that the M/N6 national primary road corridor is identified as part of the TEN-T Comprehensive Network. Such a designation has repercussions and action requirements for policies and objectives which should be considered in the preparation of the JUAP.

It is of particular importance that policies and objectives are drafted which allow the network of national roads including the M/N6 and its associated junctions 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.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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Project Ireland 2040, 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 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 (NSO) no. 2 of the *National Planning Framework*. This requirement is further reflected in the existing Statutory Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012).

As the Councils will be further aware, the National Investment Framework for Transport in Ireland (NIFTI) in Section 1.4 *Strategic Investment Framework for Land Transport* states that future transport investment projects and programmes "will have to demonstrate their fit with NIFTI and, by extension, with the NPF and NSOs." NIFTI sets 4 Investment Priorities which indicates the need to utilise the NIFTI modal and intervention hierarchies to order potential investment.

The maintenance and protection of the strategic function of the national road network, that includes junctions, is also amongst the guiding principles of the transport strategy of the Eastern & Midland *Regional Spatial and Economic Strategy* (RSES) at Regional Policy Objective (RPO) 8.1. RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management. In addition, RPO 8.3 requires that future development is to be planned and designed in a manner that inter alia protects and maintains regional accessibility.

The Northern & Western RSES recognises Connectivity as Growth Ambition 3 of the strategy and RPO 6.5 states "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."

Consideration and integration of the provisions of the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) in the JUAP will ensure concordance of JUAP development policies with official national roads policy to protect and safely maintain the strategic traffic function of the national road network. TII observes that Section 2 of the *Strategic Issues Paper* entitled *Strategic Planning Framework* does not include reference to this document. The planning authorities are reminded that the *Spatial Planning and National Roads Guidelines for Planning Authorities* are amongst the set of ministerial guidelines made and operating under Section 28 of the Planning and Development Act 2000 (as amended) to which all planning authorities must have regard in the performance of their functions. At national level sustainable land use development and practice and procedure policy, Section 28 Guidelines sit alongside the Project Ireland 2040 National Planning Framework in the Strategic Planning Framework.

Recommendation:

There is a critical need to manage and protect the national roads of M/N6, N55, N61 and N62 with associated junctions roads in accordance with national and regional policy as outlined in the provisions of Project Ireland 2040, National Investment Framework for Transport in Ireland (NIFTI), and Section 28 Guidelines that apply nationally. TII requests that the future plan reflects the foregoing provisions of official policy and national objectives in relation to spatial planning and national roads.

2.0 Planning For Development and National Roads

As demonstrated in this submission, the Authority seeks to ensure that the carrying capacity, operational efficiency, safety, national investment made and being made in the national roads continue to be safeguarded and that the relevant policies and objectives to be included in the draft plan are developed to reflect this.

In accordance with Government policy, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development being framed within a coherent integrated land use and transportation strategy. The Authority respectfully points out that although a requirement may be identified for the development of a particular location, any local transport function of national roads in respect of such areas is, and must continue to be, secondary to the role of these roads in catering for strategic traffic. Such an approach, consistent with the provisions of official policy, supports access to markets and economic growth. In addition, proposals should not be developed that are to the detriment of the investment in national infrastructure, by eroding or undermining that investment, which is required to service the Country's major inter-urban and inter-regional transport requirements and underpins economic competitiveness.

Recommendation:

The Authority recommends that residential, retail, and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot, and private car so that the variety of residential, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society.

Deferring critical policy and road safety considerations to the development management function of the planning authority is considered to conflict directly with the provisions of the Ministerial *Spatial Planning and National Roads Guidelines for Planning Authorities*.

In TII's opinion, the co-ordination of land use planning and transportation will be a critical to achieving the complementary objectives of compact urban growth while safeguarding the strategic function of the M/N6, N55, N61 and N62. Regard to Chapter 2 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) will in the preparation of the draft JUAP will ensure plan-led incorporation of compatible strategic and local transport development policies and objectives into the JUAP prior to being used as the basis to support any decisions at planning application stage.

3.0 Area Based Transport Assessment (ABTA)

TII notes the references to the ABTA that the Councils have prepared for Athlone at *Section 9 Transport & Movement of the Strategic Issues Paper* and the intention that it should "guide and inform our transition towards sustainable mobility in conjunction with delivering appropriate levels of development to support Athlone's sustained growth as an urban regional centre".

TII welcomes an evidence-based approach to planning policy and undertaking of detailed transport modelling, as necessary. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot, and private car so that the variety of retail, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society. To assist in such exercises, TII and the NTA jointly prepared Area Based Transport Assessment (ABTA) Guidance. A collection of TII and NTA documents form ABTA guidance originally published in 2018 and currently consisting of the NTA's *ABTA Advice Note, ABTA Pilot Methodology and Templates* and TII Publications ref. PE-PDV-02046 *ABTA Guidance Notes*.

Section 2 *Strategic Planning Framework* of the *Strategic Issues Paper* states that the JUAP will be informed by *inter alia* and Athlone Area Based Transport Plan which is recognised to accord with the commitment to the preparation of a local transport plan (LTP) for Athlone at section 4.5 and RPO 8.6 of the Eastern & Midland RSES and at RPO 6.27 of the North & West RSES. TII was pleased to be consulted alongside the NTA in the preparation of the draft ABTA in the first half of 2023 under TII ref. TII23-122314.

TII is aware that an ABTA was presented at the June 2023 Municipal District of Athlone-Moate Council monthly meeting. TII was unable to ascertain the status of this document nor its contents. It is expected that an Athlone Area Based Transport Plan which will be drafted using the ABTA process and, in turn, inform development policies and objectives for the JUAP.

Recommendation:

In view of the critical location of Athlone on the national road network, safeguarding of investment and the joint nature of the ABTA Guidance, continued engagement of TII and the NTA in the ABTA process is strongly recommended. It would appear that this recommendation could be readily initiated by the circulation of the ABTA to stakeholders including TII.


In advance of the Draft JUAP, TII would welcome and facilitate further engagement on the preparation of the ABTA and Athlone Transport Plan in order options assessed and measures identified are complementary to the function of the national roads as set out in official national policy and demonstrate consideration of underlying measure specific requirements including the application of NGS Circular No. 2 of 2022 re. *Application of Guidelines and Standards in relation to works on Public Roads in Ireland*.

Conclusion

Having regard to the contents of this submission, the critical location of Athlone on the national road and TEN-T networks, the transboundary joint nature of the LAP, and the stated intention to prepare an a transport plan (LTP) for the JUAP, TII emphasises its availability to meet the executives of both County Councils alongside the NTA to discuss any issues arising in the foregoing.

Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001 as amended.

Yours faithfully,



Tara Spain
Head Land Use Planning