

Forward Planning Section
Planning Department
Roscommon County Council
Áras an Chontae
Roscommon
F42 VR98



Dáta | Date
6 March, 2019

Ár dTag | Our Ref.
TII19-104650

Re: Draft Variation no. 2 to the Monksland-Bellanamullia (Athlone West) Local Area Plan, 2016 - 2022, (incorporating Draft Variation no. 2 to the Retail Strategy for County Roscommon)

Dear Sir/Madam,

TII welcomes referral of Draft Variation no. 2 to the Monksland - Bellanamullia (Athlone West) Local Area Plan, 2016 - 2022.

It is acknowledged that the variation makes proposed alterations to the text of the Monksland - Bellanamullia (Athlone West) Local Area Plan, 2016 – 2022, incorporating the Draft Athlone Joint Retail Strategy.

1. Co-ordinated Planning

As outlined in previous submissions to the planning authorities concerned, TII supports the preparation of a co-ordinated plan for the Athlone area covering the M6/N6 strategic corridor to outline a co-ordinated, consistent approach to development affecting the national road. In that regard, TII welcomes the preparation of the Draft Athlone Joint Retail Strategy and the provisions of the Draft Regional Spatial and Economic Strategies for both the Eastern and Midland and Northern and Western Regional Assemblies requiring the preparation of a Joint Urban Area Plan for Athlone by Roscommon and Westmeath County Councils. TII welcomes future consultation from the local authorities on the proposed Joint Urban Area Plan.

2. Strategic National Road Network and Retail Planning

The Council will be aware that the M/N6 Dublin to Galway route through Athlone is identified as part of the TEN-T Comprehensive Network which has repercussions and action requirements for policies and objectives which should be considered in the preparation of any new Joint Retail Strategy.

Project Ireland 2040 | National Development Plan, 2018 – 2027, outlines the investment priority 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, accessibility and connectivity to transport 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 M/N6 route is an important strategic national road and gives 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 of the strategic function of the N55, N61 and N62, national secondary roads, in the area.

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In terms of accessibility, Section 5.4 of the Draft Athlone Joint Retail Strategy identifies that the existing M6/N61 junctions are nearing capacity and further commercial, enterprise and residential development in the M/BLAP area will put additional pressures on capacity and increase road safety issues. It is indicated that improvements are required if the issues are to be addressed. It is noted that the improvements are proposed to emerge from the Athlone West Strategic Transport Assessment which is currently being prepared for the M/BLAP (Athlone West) area, and will provide recommendations concerning infrastructure upgrades, etc.

As the Council is aware, TII recommended the completion of an evidenced based Strategic Transport Assessment to inform the adoption of the Monksland-Bellanamullia Local Area Plan, 2016 – 2022. In that regard, TII welcomes the confirmation that the Athlone West Strategic Transport Assessment (STA) is currently being prepared and will inform infrastructure improvements in the area. TII would welcome consultation on the preparation of the STA in the interests of ensuring development proposals can proceed complementary to safeguarding the strategic function of the national road network in the area.

The requirement for an STA is considered particularly relevant given the extent of development lands identified in Monksland-Bellanamullia related to Industrial Uses and Business Enterprise Park and Light Industry Uses in proximity to M/N6 Junction 13. TII also notes the proposed Objective SO 3 lands in the vicinity and the potential for further future retail warehousing in the area, subject to Policy RP 11 of the Draft Athlone Joint Retail Strategy.

It is considered a critical requirement that a Strategic Transport Assessment is undertaken to inform decisions in relation to infrastructure improvements in the area to ensure planned development can proceed complementary to safeguarding the strategic function and operation of the national road network in the area. TII would welcome an update on the position of the STA, and, as indicated above, would welcome consultation on it's preparation.

3. Specific Policies and Objectives

In addition to the above, TII would welcome inclusion of policies related to the requirement for Traffic and Transport Assessment (TTA) in the Draft Athlone Joint Retail Strategy in accordance with the provisions of Section 4.10 of the DoECLG Retail Planning Guidelines, 2012.

TII would also welcome the key message of Section 4 of the Retail Planning Guidelines being included as a Retail Policy in the Draft Athlone Joint Retail Strategy which confirms a general presumption against large out of town retail centres in particular those located adjacent or close to existing new or planned national roads/motorways.

In addition to consultation on the STA, TII would also welcome consultation on the proposed framework plan for SO3 District Centre lands in the Monksland-Bellanamullia area, having regard to the potential cumulative impact of planned development in the vicinity of M/N6 Junction 13 on the strategic national road network.

It is noted with concern that Retail Warehouse use is proposed to be 'Open for Consideration' in the BE zoning objective included in the revised Land Use Zoning Matrix of the Monksland-Bellanamullia (Athlone West) Local Area Plan, 2016 – 2022.

TII previously addressed this issue in submissions to the Draft Monksland-Bellanamullia (Athlone West) Local Area Plan, 2016 – 2022, where Retail Warehousing was a use considered 'acceptable' in the 'Business, Enterprise Park/Light Industry' zoning objective which also underlies Strategic Objective lands SO4 and SO5. The Council will be aware of the presumption against large scale retailing adjacent or close to existing, new or planned national roads which is outlined in Chapter 4 of the DoECLG Retail Planning Guidelines. The Authority considers that this designation and the provision of the zoning matrix should be reviewed prior to the adoption of Proposed Variation no. 2 to the Local Area Plan to ensure consistency with Government guidance in this regard.



4. Conclusion

In conclusion, TII welcomes referral of the Draft Athlone Joint Retail Strategy and confirmation of preparation of the Athlone West Strategic Transport Assessment (STA). TII would welcome update and consultation on the STA and consideration by the Council of including requirements included in the DoECLG Retail Planning Guidelines, 2012, related to TTA and the general presumption against large out of town retail centres in particular those located adjacent or close to existing new or planned national roads/motorways to be included in the Draft Athlone Joint Retail Strategy prior to adoption.

TII also considers that provision should be made for including in the local planning framework and/or Retail Strategy any recommendations related to proposed infrastructure works required to facilitate the extent of planned development in the area identified in the Athlone West Strategic Transport Assessment

It is requested that the foregoing comments and observations are taken into consideration prior to the adoption of Proposed Variation no. 2 to the Monksand-Bellanamullia (Athlone West) Local Area Plan, 2016 - 2022.

Yours sincerely,



Michael McCormack
Senior Land Use Planner

