



Draft Wicklow Rathnew Draft LAP Amendment Stage Submission - Report

Who are you:	State Body
Name:	Transport Infrastructure Ireland (TII)
Reference:	DWTRLAP-145625
Submission Made	March 26, 2025 3:01 PM

Topic

LAP - Proposed Material Amendments No 11 Submission

Submission

Please see submission attached (TII ref. TII24-130624)

Topic

LAP - Proposed Material Amendments No 44 Submission

Submission

Please see submission attached (TII ref. TII24-130624)

File

TII25-130624 - Proposed Material Amendments to the Draft Wicklow Town & Rathnew Local Area Plan 2025_issued 26.03.2025.pdf, 0.38MB

Wicklow Town & Rathnew LAP
Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

Online submission: <https://wicklow-rathnew-lap-wicklow.hub.arcgis.com/>

Dáta | Date

26/03/2025

Ár dTag | Our Ref.

TII24-130624

RE: Proposed Material Alterations to the Draft Wicklow Town & Rathnew Local Area Plan 2025

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) has reviewed the proposed Material Alterations to the Draft Wicklow Town & Rathnew Local Area Plan 2025 -2031 (draft LAP).

TII made submission to the Pre-Draft (TII ref. TII23-123774) and Draft (TII ref. TII24-129028) stages of the draft LAP. TII's observations continue to seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in the Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), in accordance with *Project Ireland 2040*, the *EMRA Regional Spatial and Economic Strategy (RSES)*, *NTA Greater Dublin Area Transport Strategy 2022-2042* and having regard to the provisions of the Wicklow County Development Plan 2022 – 2028.

TII is responsible for the maintenance and operation of safe and efficient national road and light rail networks and reminds that, as the Council is aware, the N/M11 is part of the TEN-T Comprehensive Network and a critical enabler of national, regional, and local development policy and elements of the national road network in the draft LAP area are operated and managed by a Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. TII continues to observe that the draft LAP Transport Assessment at Appendix 1 of the draft LAP encompasses the N/M11 at a location where the motorway, including the interchange at Junction 16 (Wicklow (north)), is part of MMaRC Area A. Junction 17 (Rathnew) is also part of MMaRC area A and Junction 18 is part of a PPP area operated by N11 Arklow Rathnew PPP Ltd.

Having regard to official policy, previous Draft Plan TII submission in relation to draft LAP *Chapter 9 Infrastructure*, *Chapter 11 Land Use Zoning* and *Appendix 1 Transport Assessment*, and the *Proposed Material Amendments to the Draft Wicklow Town-Rathnew Local Area Plan 2025* on display in the dedicated online portal, TII provides the following commentary in relation to Proposed Material Alterations on display:

1.0 Proposed Material Alteration no. 11 for draft LAP Chapter 9 Infrastructure

Proposed Material Alteration no. 11 proposes a new Transportation development objective as follows:

“WTR – XX

In collaboration and with the support of the relevant transport agencies to prepare a Local Transport Plan for Wicklow Town – Rathnew. The preparation of the plan would be subject to screening for both SEA and AA and, as relevant, subsequent stages of assessment.”

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.

Having regard to the TII submission to the Draft LAP, that highlighted the prescribed necessity for a Local Transport Plan (LTP) to be prepared in respect of Wicklow-Rathnew, TII endorses proposed material alteration no. 11.

TII reminds that the NTA's *Greater Dublin Area Transport Strategy 2022-2042* at Section 8.11 describes LTPs and their formulation utilising the ABTA methodology. It remains the Authority's opinion that the Council should have considered undertaking appropriate Area Based Transport Assessment (ABTA) to support the preparation of the draft LAP, particularly in relation to areas of planned development which have an interface with the national road network. Section 1.4 of the NRA/TII Traffic and Transport Assessment Guidelines (2014) refers. In addition, guidance is also available in TII Publications PE-PDV-02046 Area Based Transport Assessment (ABTA) Guidance Notes, jointly prepared by TII and the NTA. Furthermore, having regard to TII ABTA Guidance, it was requested that TII be formally engaged in any ABTA process to be undertaken to inform the Draft LAP.

Recommendation for related proposed material alteration no. 44

TII recommends that LAP *Appendix 3 Infrastructure Delivery Schedule and Implementation* proposed material alteration no. 44 be updated to ensure inclusion of "WTR-XX" the subject of proposed material alteration no. 11. This recommendation is in the interests of the timely preparation of the LTP as part of the operation of the LAP.

2.0 Proposed Material Alterations no. 12 for draft LAP Chapter 9 Infrastructure

Proposed Material Alteration no. 12 proposes a new *Transportation* development objective related to bus services. The Authority notes the inclusion of the N/M11 in this new objective. TII recommends that the proposed development objective the subject of material alteration no. 12 where it interacts with the national road network, does so in manner that is compatible with stated government objectives for N/M11 improvement, exchequer funding, and the status and function of that network in accordance with official national roads policy and standards.

TII again reiterates that any proposals which interact with the national road network must observe *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) in the first instance and require prior consultation with TII and compliance with all relevant requirements set out in TII Publications available (www.tiipublications.ie). TII advises that these statutory planning guidelines and TII standards have implications for any proposals and objectives associated with the N/M11, particularly outside urban speed limits.

Notwithstanding material alteration no. 11 committing to the preparation of an LTP, until its preparation and adoption of measures identified therein, it is inappropriate that the LAP does not make reference to official national roads policy and standards. In this regard in particular, TII reminds that County Development Plan Objectives that recognise official National Roads Policy do not include reference to TII Publications. As such, TII is concerned that the stated intention of the implementation of the *Transport Assessment* as at draft LAP *Appendix 3 Infrastructure Delivery Schedule and Implementation* does not appear to be altered to include or defer to the proposed Local Transport Plan (LTP) as part of the proposed Material Alterations. As such, transport interventions that may impact the the national road network may progress without due regard to the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), compliance with the requirements of TII Publications, and therefore may conflict with and be contrary to the interests of the safe and efficient operation of the national road network.

The Council are 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 Council is also advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising to the national roads network to accommodate local development proposals, including the LTP, will be borne by the local authority and will not be funded by TII. TII is not aware of any current national roads schemes in or adjacent the draft LAP area, and that would in any event be scheduled in the NDP.

Conclusion

In relation to the Proposed Material Alterations on display, TII respectfully requests that the foregoing observations are taken into consideration by the Council prior to finalising the Local Area Plan (LAP) to ensure that the LAP provisions accord with proper planning and sustainable development where development interfaces with the national road network.

The Authority is available to meet the Executive of the County Council to discuss any issues arising in the foregoing or other matters related to the LAP and the national road network.

TII reiterates its availability and willingness to progress the Local Transport Plan (LTP) now a proposed Transportation objective by proposed material alteration no. 11 of the draft LAP.

Please acknowledge receipt of this submission.

Yours faithfully,



on behalf of
Land Use Planning Unit

**Note: In accordance with the provisions of section 13 of the Roads Act 2015, Transport Infrastructure Ireland (TII) is the operational name of the National Roads Authority with effect from 1 August 2015.*

All planning application referral documentation, including applications, submission acknowledgments, further information notifications and decisions should be notified electronically to TII at landuseplanning@tii.ie. TII would appreciate your Authority's assistance on this matter.