



Draft Blessington Local Area Plan Submission - Report

Who are you:	State Body
Name:	Transport Infrastructure Ireland (TII)
Reference:	DBLESSLAP-154610
Submission Made	November 21, 2024 3:47 PM

Topic

Proposed Variation No. 3 to the CDP

Submission

Please see TII submission to Proposed Variation No. 3 of the Wicklow County Development Plan (TII ref. TII24-129310)

File

Proposed Variation no. 3 Wicklow County Development Plan_submission_TII ref. TII24-129310_issued_21.11.2024.pdf, 0.44MB

Variation No. 3
Administrative Officer
Planning Department
Wicklow County Council
County Buildings
Station Road
Wicklow Town

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

Dáta | Date 21 November 2024

Ár dTag | Our Ref. TII24-129310

Re: Proposed Variation No. 3 of the Wicklow County Development Plan

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) acknowledges referral of the above proposed Variation no. 3 of the County Development Plan for the Blessington Local Area Plan (LAP) 2025.

TII's observations on the proposed Variation No. 3 are contained within the enclosed TII submission concurrently made in respect of the Blessington Local Area Plan (LAP) 2025 (TII ref. TII24-129303). Please acknowledge receipt of this submission.

Please acknowledge receipt of this submission.

Yours sincerely,



Cliona Ryan
Land Use Planner

Blessington LAP
Administrative Officer
Planning Department
Wicklow County Council
County Buildings
Station Road
Wicklow Town

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

Dáta | Date 21 November 2024

Ár dTag | Our Ref. TII24-129303

Re: Draft Blessington Local Area Plan (LAP) 2025

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) welcomes notice of the preparation of a Local Area Plan (LAP) for Blessington by Wicklow County Council and notes that the draft LAP which is the subject of concurrent proposed Variation no. 3 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. Future Future Luas, Metro and BRT alignments are a matter for the NTA. In addition, TII also has a remit designated by the Department of Transport, which includes greenways and the development of a plan for an inter-urban cycle network which is delivered by the National Cycle Network Plan (NCN) published in January 2024.

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 reflected in the existing statutory Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and recorded at subsection 3.6 *Transport & Accessibility* of *Chapter 3 Core Strategy of the County Development Plan 2022 – 2028*.

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 NTA *Greater Dublin Area Transport Strategy 2022-2042* at Measure ROAD2 sets out National Roads Requirements explicitly complementary to the Guidelines and includes provision 1: - *"The primary function of national roads is to cater for strategic traffic and this function must be protected"*.

Chapter 12 Sustainable Transportation of the *Wicklow County Development Plan 2022 – 2028* includes *National Road Objectives* set out at County Plan Objectives (CPOs) 12.35 to 12.42 with roadside signage objectives for the N/M11 and N81 at CPO 12.69 and 12.70 respectively. CPO 12.40 expressly recognises the the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012).

As part of TII's responsibilities for managing and improving the country's national road and light rail networks, the Authority sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology to be prepared to precede or accompany applications for developments or works. Technical guidance and standards are contained in TII Publications, available at <https://www.tiipublications.ie/>.

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.



By review of the draft LAP maps, TII notes the following interactions between the draft LAP and the N81: -

- The “**Settlement Boundary**” indicated in the draft LAP maps includes the N81 which is currently subject to 100 kmh, 80 kmh, 60 kmh and 50 kmh limits within that LAP settlement boundary.
- Draft LAP Map No. 1 Land Use Zoning Objectives indicates two “**Specific Local Objective**” (SLO) areas adjoining the N81 at its northern end within the LAP area. SLO 3 appears to adjoin the western side of the N81 at the 100 kmh speed limit zone and SLO 4 appears to adjoin the eastern side of the N81 at the 80 kmh zone.
- Also indicated on draft LAP Map No. 1 Land Use Zoning Objectives are “**Road Objectives**” interacting with the N81 toward the northern and southern end of the draft LAP area.
- Draft LAP Map No. 1 Land Use Zoning Objectives and Map No. 5 Transport Strategy indicate “**Preferred Route Alignment N81 Tallaght to Hollywood Cross Road Improvement Scheme**” that bypass Blessington to the north and is indicated to interchange with the existing N81 inside the southern end of the draft LAP boundary and outside of the northern end of the draft LAP boundary.
- Draft LAP Map No. 1 Land Use Zoning Objectives, Map No. 5 Transport Strategy, Map No. 6 Active Travel Strategy, and Map No. 7 Greenway Supporting Infrastructure indicates the inclusion of a section of the “**Blessington eGreenway**” within the LAP boundary.
- Draft LAP Map No. 7 Greenway Supporting Infrastructure also indicates a “**Local Greenway Feeder**” annotation along the N81
- Also noted indicated on the western side of the N81 in the vicinity of the transition is a “**Potential Supporting Car Park Location**”. Another “Potential Supporting Car Park Location” is noted located far east of the N81 toward the northeastern extremity of the draft LAP area.
- The items annotated on draft LAP Map No. 7 are repeated Map No. 6 Active Travel Strategy. TII notes that the “Potential Supporting Car Park Location” in the vicinity of the N81 and Blessington WWTP is annotated with a “**Route Greenfield / Brownfield**”.

The following TII observations seeks 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 *Project Ireland 2040*, the Section 28 Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012), and the *Eastern Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES)*: -

1.0 Strategic Transport Context

The Authority advises 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 priority or timeframe for national road schemes may be subject to alteration. TII advises that a realignment scheme for the N81 in the vicinity of Blessington is not currently or resourced under the National *Development Plan 2021 – 2030* (NDP).

TII observes that the draft LAP at Map No. 1 Land Use Zoning Objectives and Map No. 5 Transport Strategy identifies “*N81 Tallaght to Hollywood Cross Road Improvement Scheme*” and “*N81 Preferred Route corridor*”. The Council is aware of the foregoing status of the “*N81 Tallaght to Hollywood Cross Road Improvement Scheme*”. TII reminds the Council that the implementation of land use and transposition objectives, including Specific Local Objectives (SLOs) and interventions reliant on this national road scheme should have regard that this project is not currently resourced under the NDP and/or Government Exchequer funding.

2.0 Draft LAP, National Roads and Appropriate Transport Assessment

Regional Policy Objective (RPO) 8.6 of the EMRA RSES requires Local Transport Plans (LTPs) to be prepared for selected settlements in the Region by local authorities in conjunction with the NTA. The *GDA Transport Strategy* includes *MEASURE PLAN17 – Local Transport Plans* are to be based on the ABTA methodology as part of the statutory plan-making process. Wicklow County Development Plan *Sustainable Transport Objectives* in Chapter 12 includes *Sustainable Mobility Objectives* including CPO 12.3 to prepare and / or update existing Area Based Transport Assessments (ABTAs) and LTPs for all towns in Levels 1-4 of the County settlement hierarchy which includes Blessington.

The TII submission to the pre-draft stage of the Blessington LAP recommended that land use transportation assessment for any future Local Area Plan should be prepared based on an evidence-based area transport assessment in accordance with the requirements of the *Spatial Planning and National Roads Guidelines* and the *Greater Dublin Area Transport Strategy* and should demonstrate compatibility with the strategic function of the national road network. TII further recommended that any land use transportation assessment to support the LAP should be prepared in accordance with the ABTA Guidance and referred the Council to section 1.4 of the TII Traffic and Transport Assessment Guidelines (2014) that addresses Area Based Transport Assessment (ABTA) for Forward Planning. In addition, TII directed attention to guidance also available in TII Publications PE-PDV-02046 (Area Based Transport Assessment (ABTA) Guidance Notes), jointly prepared by TII and the NTA.

TII notes the inclusion of *Appendix 4 Blessington Local Transport Assessment* as part of the draft LAP and highlights the following:

- TII notes and supports that the draft LAP *Appendix 4 Transport Assessment* is stated at Part 1 to have had regard inter alia to the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and ABTA guidance. TII also notes that the draft LAP *Appendix 6 Infrastructure Delivery Schedule and Implementation* includes the statement to “implement measures identified” in the Transport Assessment.

However, TII is of the opinion that the draft LAP *Transport Assessment* does not represent nor meet the requirements of evidence based transport planning as would be expected to accompany an ABTA or an LTP nor the requirements of County Development Plan Sustainable Mobility Objective CPO 12.3 for the preparation of an LTP for Blessington.

- TII advises that having regard to proposed *Transport Assessment* active travel, public transport and roads “recommendations” and “objectives” that potential interactions with the national road network including its interchanges/junctions and ancillary infrastructure such as structures and drainage will also occur but have not been addressed. This is a concern.
- Having regard to the draft LAP’s extent including the N81 and interactions identified at the outset of this submission, TII recommendations for an ABTA process to inform a draft LAP for Blessington require that that any measures, objectives or recommendations identified that interact with the national road network do so in a manner that: -
 - observes national roads policy set out in *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012); and
 - recognises of the existence of and compliance responsibilities for the design and delivery of projects impacting the national roads network under TII Publications (<https://www.tiipublications.ie/>).
- In the interests of aiding future reviews, TII recommends an editing review of the *Transport Assessment* for uniformity of contents headings with those utilised in the document and to ensure that numbering of subheadings is in order. For example, the contents list part 3 as *Transport Objectives* and the body of the document entitles this part *Transport Strategy & Objectives*, the body of the document appears of have subsection 2.3.2. followed by 2.3.4, section 2.4 is entitled *Roads Infrastructure* but certain of the subheadings begin with 2.3 rather than 2.4, and there is a repeat of section 2.4 entitled *Car Parking*.

Recommendation 1:

Clarification of the role of the draft LAP *Transport Assessment* and the requirement under County Development Plan *Sustainable Mobility Objective* CPO 12.3 for the preparation of an LTP as part of the LAP.

In this regard, TII recommends a review and revision of the proposed Transportation Objectives BLESS 43 to BLESS 50 to include a dedicated Transportation Objective for the undertaking of an LTP which observes the ABTA methodology and takes account of policy and interactions with national road networks infrastructure.

3.0 Draft LAP *Transportation Objectives* in Chapter B.7 *Infrastructure* of the draft LAP

The indicated extent of land use and transportation objectives of the draft LAP that will create interactions with the N81 especially at locations outside urban speed limit zones. TII strongly recommends explicit recognition of official national roads development policy and TII Publications amongst the *Transportation Objectives* of the LAP to ensure compatibility of future development with the maintenance of the safe and efficient operation of the national road network in accordance with official national roads policy and TII Publications.

In this regard, TII notes that the current *Transportation Objectives* of the draft LAP BLESS 43 to BLESS 50 include the objectives to “support the implementation of the recommendations of the *Transport Assessment*” for improvement and safety schemes and greenway that interact with the N81 at BLESS43; regional / distributor roads and road improvements at BLESS44; and active travel routes along the existing road network including the N81 at BLESS45.

TII further notes that other *Transportation Objectives* include provisions that could interact with the N81 such as the greenway feeder route that is indicated along the N81, BLESS46; additional car parking along the N81 and assumed to include “*Potential Supporting Car Park Locations*” indicated on *Map No. 7 Greenway Supporting Infrastructure* as BLESS 48; consideration of bus stops potentially located outside the urban speed limit zone on the N81 associated with welcomed improvements to bus services under BLESS49. The implementation of all and any of these *Objectives* have the potential to interact directly and indirectly with the national road network and associated assets.

TII recommends that TII Publications (Standards and Technical) that should be recorded to be observed as part of the *Transportation Objectives*. TII Publications set design guidance for the national road network and associated infrastructure as echoed in section 1.3 *Application of this Manual* of DMURS and Government’s *NGS Circular No. 2 of 2022 re. Application of Guidelines and Standards in relation to works on Public Roads in Ireland*.

In this way, transport objectives and/or measures promoted in the draft LAP will have had regard to national road network requirements by assessment of land use transportation measures sought to be developed against national road policy and standards ensuring the implementation of local transport objectives are complementary to maintaining the strategic function of the national road network.

TII also notes the stated intention of the “on-going” implementation of the *Transport Assessment* as part of a “living programme” at draft LAP *Appendix 6 Infrastructure Delivery Schedule and Implementation*. TII is concerned that transport interventions that may impact the national road network may progress without regard to the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) or compliance with the requirements of TII Publications, and therefore may be contrary to the interests of the safe and efficient operation of the national road network.

Having regard to the above and in the interests of coherent implementation of the draft LAP that appears to include future intended reviews and implementation of the recommendations of the *Transport Assessment*, TII recommends the following critical revision to LAP *Transportation Objective* BLESS 50:

Recommendation 2:

Revision of proposed draft LAP *Transportation Objective* BLESS 50 to reflect official national roads policy and for the requirements of TII Publications for works potentially impacting the national road network.

Revision of *Transportation Objective* BLESS 50 in Chapter B.7 *Infrastructure* as follows:

“To protect the strategic function of the N81 (and any upgrade/bypassed route thereof) as it relates to the plan area in accordance with *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and in compliance with TII Publications.”

4.0 Draft LAP Chapter B.8 Zoning, Specific Local Objectives SLO 3 and SLO 4

TII notes that *Chapter B.8 Zoning* of the draft LAP at section 11.5 *Specific Local Objectives* states that Specific Local Objectives (SLOs) are provided "...to guide developers as to the aspirations of the plan regarding development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where lands are zoned for 'mixed use' to give more detail on the development objective of these lands. A masterplan for the entire ALO area may be required to be agreed prior to the submission of the first application within the SLO." A total of 8 no. SLO areas are identified and described in the draft LAP, most accompanied by a "Concept Plan".

At the outset of this submission TII noted that two Specific Local Objectives (SLOs) adjoin the N81 at its northern end within the draft LAP area; SLO 3 appears to adjoin the western side of the N81 at the 100 kmh speed limit zone, and SLO 4 appears to adjoin the eastern side of the N81 at the 80 kmh zone.

TII has also observed that each of the proposed SLOs holds, or, is bounded by indicative "Road Objectives" that appear to consist of of "R01" an "Arterial Street" west of the N81 in SLO 3 and "R04" a "Link Street" to the east of the N81 in SLO 4 that are indicated to join the N81 in a revised junction arrangement in the vicinity of of the access to Doran's Pit and the junction of the L-8734.

Draft LAP SLO3 and SLO4 lands relative the N81 national strategic asset are at locations where the 80 kmh and 100 kmh limits apply. TII would highlight that these proposed SLOs have potential for impacts and interactions on the national road network.

TII reminds the Council of the requirements of Section 2.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) which requires careful forward planning consideration of the speed limit and capacity of the national road network.

In addition, having regard to the indicated roundabout connection of the proposed local roads to the N81 which will create a new national road junction, regard should be had to Section 2.7 of the Guidelines which indicates 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.

TII advises that the guidance indicates that planning authorities must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning existing or planned junctions and interchanges, thereby avoiding 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.

TII would have expected that these requirements associated with the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) would be addressed as part of the *Transport Assessment* associated with the draft LAP. This apparent omission of addressing national planning policy in an evidenced manner for these significant development areas is a serious concern to the Authority.

Related to the above matters, future potential development physical interactions with national roads infrastructure will need to demonstrate compliance with TII Publications.

In summary, TII are of the opinion that there is a serious deficiency in the draft Local Area Plan and these SLO's with respect to already indicated deficiencies in transport assessment, consideration of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and in turn addressing the protection of national roads physical assets in compliance with TII Publications. TII are therefore of opinion that taking account of the contents of location and proposed development profile of SLO(s) 3 and 4 that these objectives and the SLO 4 concept plan are premature and require revision prior to adoption of the draft Local Area Plan.

Recommendation 3:

Review and Revision of Specific Local Objectives SLO 3 and SLO 4 to reflect official national roads policy and for the requirements of TII Publications.

Review and revision of SLO(s) 3 and 4 to take account of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and the maintenance of the safe and efficient operation of national road network assets in accordance with TII Publications.

Conclusion

TII has identified potential significant interaction of the draft LAP with the national road network with the N81, a vital inter-regional route part of o the national road network and upon which Blessington relies.

The recognition of the foregoing provisions of official policy and national objectives in relation to spatial planning and national roads by specific written reference to the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) and TII Publications in the draft LAP is critical also having regard to Appendix 4 *Blessington Local Transport Assessment* of the draft LAP that includes recommendations likely to directly or indirectly impact the N81.

The 3 no. recommendations in this submission accord with existing national, regional and local development policy and objectives related to national road networks and seek to advance certain relevant draft Transportation and Specific Local Objectives (SLOs) in a manner that will foster future development compatibility with the maintenance of the safe and efficient operation of the national road network.

Having regard to the TII submission to the Pre-Draft stage of the LAP (TII ref. TII24-126328), TII/NTA Area Based Transport Assessment (ABTA) Guidance, and the contents of this submission, TII is available to meet the executives of the County Council alongside the NTA to discuss any issues arising in the foregoing.

Please acknowledge receipt of this submission.

Yours sincerely,



Cliona Ryan
Land Use Planner