



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	State Body
Name:	Transport Infrastructure Ireland (TII)
Reference:	DWTRLAP-152923
Submission Made	November 20, 2024 3:31 PM

Topic

Proposed Variation No. 2 to the CDP

Submission

Please see attached TII submission to Variation No. 2 of The Wicklow County Development Plan (TII ref. TII24-129029).

File

Proposed Variation no. 2 Wicklow County Development Plan_submission_TII ref. TII24-129029_issued_20.11.2024.pdf, 0.43MB

Variation No. 2
Administrative Officer
Planning Department
Wicklow County Council
County Buildings
Station Road
Wicklow Town

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

Dáta | Date 20 November 2024

Ár dTag | Our Ref. TII24-129029

Re: Proposed Variation No. 2 of the Wicklow County Development Plan

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) acknowledges referral of the above proposed Variation no. 2 of the County Development Plan for the Wicklow Town – Rathnew Local Area Plan (LAP) 2025.

TII's observations on the proposed Variation No. 2 are contained within the enclosed TII submission concurrently made in respect of the Draft Wicklow Town – Rathnew Local Area Plan (LAP) 2025 (TII ref. TII24-129028).

Please acknowledge receipt of this submission.

Yours sincerely,



Cliona Ryan
Land Use Planner

Encls. Copy of TII submission to Draft Wicklow Town – Rathnew Local Area Plan (LAP) 2025 (TII ref. TII24-129028), Nov. 2024

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Wicklow Town – Rathnew LAP
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Re: Draft Wicklow Town – Rathnew Local Area Plan (LAP) 2025

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) welcomes notice of the progression of the preparation of a Local Area Plan (LAP) for Wicklow Town – Rathnew by Wicklow County Council and notes that the draft LAP is the subject of concurrent proposed Variation no. 2 of the Wicklow County Development Plan 2022 – 2028.

As set out in TII's previous submission to the pre-draft stage of the LAP, the M/N11 corridor is identified as part of the TEN-T Comprehensive Network and critical for access to Rosslare Europort. The international dimension is reflected in the Eastern and Midland Assembly Regional Spatial and Economic Strategy (EMRA RSES) Regional Policy Objective RPO 8.16.

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, which 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 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 12.35 relates specifically to the N/M11, CPO 12.38 to interchanges and CPO 12.40 expressly recognises the the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012).

TII is responsible for the maintenance and operation of safe and efficient national road and light rail networks. The Council will be aware that the N/M11 is a critical enabler of national, regional, and local development policy and elements of the national road network in this area are operated and managed by a Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII.

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In this regard, TII observes that the draft LAP *Transport Assessment* at Appendix 1 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.

TII notes the following interactions between the draft LAP and the N/M11: -

- The “*Settlement Boundary*” indicated in the draft LAP *Land Use Zoning Objectives Map* (Map 1) occurs east of the N/M11 and further indicates zoned land coinciding with the N/M11 between Junction 16 and Junction 17 contained within SLO3 and SLO5, north and south respectively of the R752.
- The draft LAP *Transport Strategy Map* (Map 5) identifies the N/M11 and denotes an “*area inside 15 min walking time to public transport or schools*” that includes the entire of the motorway interchange that is Junction 16 of the M11.
- The *Wicklow Town and Rathnew Local Area Plan – Transport Assessment* is Appendix 1 of the Draft LAP and reviews Junctions 16, 17 and 18 of the N/M11, each of which is and interchange part of the national road network; M11 Junction 16 (Wicklow (North)) with the R772; Junction 17 (Rathnew) with the R772; and Junction 18 (Wicklow (south)) with the R751.

The following TII submission 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 at European, national regional and local levels. Taking account of the above, TII makes the following observations:-

1.0 Draft LAP, National Roads and Appropriate Transport Assessment

TII 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.

TII’s review of the draft LAP observes dedicated *Transportation Objectives* contained in draft LAP *Chapter 9 Infrastructure* that have direct regard to draft LAP Appendix 1 the *Wicklow Town and Rathnew Local Area Plan – Transport Assessment* which will be part of the “on-going” delivery schedule of the draft LAP at Appendix 3 *Infrastructure Delivery Schedule and Implementation*. Land use objectives are primarily depicted on draft LAP *Map 1 Land Use Zoning Objectives* and transportation objectives appear to be indicated on Map 5 of the draft LAP is the *Transport Strategy Map* which in turn, appears to be a repeat of the *Wicklow Town – Rathnew Road Strategy Map* in Section 3 (pg. 82) of the *Transport Assessment* at Appendix 1.

1.1 Draft LAP, Appendix 1 draft Wicklow Town and Rathnew Local Area Plan – 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 specifically including Wicklow-Rathnew. RPO 8.6 is amongst those repeated in the *GDA Transport Strategy* that as part of the Strategy holds *MEASURE PLAN17 – Local Transport Plans* to be based on the ABTA methodology as part of the statutory plan-making process. County Plan *Sustainable Transport Objectives* at Chapter 12 include *Sustainable Mobility Objectives* where CPO 12.3 is 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 Wicklow-Rathnew.

As at the TII submission to the pre-draft stage of the LAP, 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.

TII has undertaken a review of the “Transport Assessment” elements of the LAP and has identified “*recommendations*” related to the national road network or regional roads (R772 and R752) that directly interact with the national road network. The following issues occur:

- TII continues to advocate an evidence-based approach to planning policy to ensure an integrated approach to the design of development areas that includes a set of principles and criteria designed to ensure a high standard of access by public transport, foot, and private car. Notwithstanding that the draft LAP Appendix 1 *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, and that draft LAP Appendix 3 *Infrastructure Delivery Schedule and Implementation* includes the statement to “implement measures identified” in the *Transport Assessment*, 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 Wicklow Town – Rathnew that reflects RSES RPO 8.6 .
- TII advises that having regard to proposed active travel and public transport “*recommendations*” that potential interactions with the national road network including its interchanges and ancillary infrastructure such as structures and drainage will also occur but have not been addressed which is a concern.

Having regard to the draft LAP’s location adjacent to the N/M11 and the transport assessment and recommendations that will directly and indirectly impact the national road network, TII recommendations for an ABTA process to inform a draft LAP for Wicklow Town – Rathnew include that any measures identified that interact with the national road network are required to :-

- observe national roads policy set out in *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012).
- recognise of the existence of and compliance responsibilities for the design and delivery of projects under TII Publications; and
- has regard to the extent of the MMarC Area A with associated requirements for the management and operation of the N/M11.

Recommendation 1:

- **Provide 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 review and revision of the proposed Transportation Objectives WTR 75 to WTR 80 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.

1.2 Draft LAP *Tranportion Objectives* in Chapter 9 *Infrastructure* of the draft LAP

TII welcomes the restatement of the County Development Plan Objectives (CPOs) that relate to the national road network in the draft LAP *Transport Assessment* and objectives of the *Transport Assessment (part 3)*. Having regard to the indicated extent of land use and transportation objectives of the draft LAP that will create interactions with the N/M11 especially at junctions and / or within an area maintained and operated as part of MMarC Network Area A, 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 WTR75 to WTR80 include the objective to “*support the implementation of the recommendations of the Transport Assessment*” for new regional / distributor roads and road improvements at WTR75, road improvements including cycling and pedestrian infrastructure at WTR76, active travel and public transport at WTR77; and the upgrading of local Rocky Road at WTR80.

The implementation of all and any of these *Objectives* has the potential to interact directly and indirectly with the national road network assets, which includes its interchanges and related infrastructure such as under and overbridges that are TII Structures. TII therefore strongly advises and recommends that TII Publications (Standards and Technical) that should be recorded as they set design guidance for the national road network and associated infrastructure as echoed in section 1.3 *Application of this Manual* of DMURS. In this way, transport objectives or measures promoted in the draft LAP will have had regard to national road network requirements by assessment of options 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 the stated intention of the “on-going” implementation of the *Transport Assessment* as part of a “living programme” at draft LAP *Appendix 3 Infrastructure Delivery Schedule and Implementation*. In this regard, TII is concerned that transport interventions that may impact the the national road network may progress without regard to the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), 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 an additional *Transportation Objective* below utilising similar form as that already presented at Draft LAP WTR78 for the NTA and Iarnród Eireann.

Recommendation 2:

- **Revision of proposed draft LAP *Transportation Objectives* to reflect official national roads policy and for the requirements of TII Publications for works potentially impacting the national road network and its associated infrastructure.**

Additional Transportation Objective no. 81 at *Chapter 9 Infrastructure* as follows:

“WTR 81

To ensure that Transportation Objectives that interact with the N/M11 interchanges or mainline and associated infrastructure shall have regard to *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and be subject to compliance with the requirements of TII Publications.”

2.0 Draft LAP Chapter 11 Zoning and Land Use, Specific Local Objectives SLO 3 and SLO 5

TII notes that *Chapter 11 Zoning and Land Use* of the draft LAP at section 11.5 *Specific Local Objectives* states that 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 details on the development objective of these lands. As masterplan may be required to be agreed prior to the submission of a planning application.”

TII observes that certain Specific Local Objectives (SLOs) are adjacent to the N/M11 and Junction 16 (Wicklow (North)); SLO 3, north of the R752 and SLO 5 is south of the R752, both immediately adjoining the N/M11 and advises as follows:

Due to the location of draft LAP SLO3 and SLO5 lands relative the N/M11 national strategic asset with associated infrastructure, including interchanges, there is potential for impacts and interactions between this section of the national road network.

TII reminds the Council of the requirements of Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) 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 such 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.

It would be expected that the above would be addressed as part of the “*transport assessment*” associated with the draft local area plan. TII issues of concern with existing “*transport assessment*” has already been raised in this submission.

In addition, and related to the above matters, future potential development physical interactions with national roads infrastructure will need to demonstrate compliance with TII Publications (for any work that may impact the national road pavement, structures and infrastructure including drainage). However, TII are not convinced that the planning authority has considered nor addressed the N/M11 and all associated infrastructure assets including lighting, gantries, signage, substations, boundary treatments and drainage arrangements. TII would highlight that future proposed development will be required to demonstrate mitigation of impact on the safe and efficient operation of the national roads network in accordance with Chapter 3 of *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and delivery of adequate levels of future land use amenity.

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 lack of transport assessment, consideration of Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and in turn addressing the protection of national roads physical assets. TII are therefore of opinion that taking account of the contents of location and proposed development profile of SLO(s) 3 and 5 that these objectives and concept plans are premature and require revision prior to adoption of the Draft Local Area Plan.

Recommendation 3:

- Review and revision of SLO(s) 3 and 5 to take account of Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and the protection of national roads physical assets in accordance with TII Publications.

Conclusion

TII has identified potential significant interaction of the draft LAP with the national road network including carriageways, interchanges and structures and associated under and overground services. There is a critical need to manage and protect the national road network and associated junctions, including the N/M11.

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 *Wicklow Town and Rathnew Local Area Plan – Transport Assessment* in Appendix 1 of the draft LAP that includes recommendations likely to directly or indirectly impact the N/M11.

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. TII23-123774), 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