

	Arklow Local Planning Framework: Proposed Material Alterations to the Wicklow County Development Plan (2022– 2028) Submission Report
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Who are you:	State Body
Name:	National Transport Authority
Reference:	ARKPMA-104430
Submission Made	May 29, 2026 10:46 AM

Topic

LPF - Proposed Material Alterations No. 5 Submission

Submission

Please find attached the submission of the National Transport Authority

Topic

LPF - Proposed Material Alterations No. 23 Submission

Submission

Please find attached the submission of the National Transport Authority

[Upload a File \(optional\)](#)

NTA_Submission_WCC_MAs_Arklow LPF_FINAL.pdf, 0.43MB

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Proposed Variation,
Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.

29th May 2026

Re: Proposed Material Alterations to the Draft Arklow Local Planning Framework (LPF) 2026 under proposed Variation No. 5 to the Wicklow County Development Plan 2022 - 2028

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Proposed Material Alterations to the Draft Arklow Local Planning Framework (LPF) 2026 and based on the Greater Dublin Area Transport Strategy 2022 – 2042 (hereafter, the Transport Strategy), would submit the below comments and recommendations for consideration.

Proposed Material Alteration No. 23 and No. 5

Proposed Material Alterations (MA) no. 23 and no. 5 propose to amend the zoning objective for c. 17ha of lands at Ballynattin, west of the M11, from 'Tourism' to 'Employment'. The NTA had previously raised concerns with the lack of clarity as to the meaning of "Tourism", in terms of the intensity of use envisaged, during consultation on the previous Local Area Plan. Similar concerns arise with the proposed alterations. The subject lands are peripheral to the established built-up-area of Arklow, are adjacent to the strategic road network and are removed from the town's active travel network and the public transport network. Measure PLAN4 of the Transport Strategy titled 'Consolidated Development' states the following:

"In accordance with the NPF and RSES, the NTA will support and prioritise development patterns in the GDA which seek to consolidate development as a means of preventing urban sprawl, reducing the demand for long-distance travel and maximising the use of existing transport infrastructure and services.

Peripheral development will be supported in exceptional circumstances – on an evidence-based planned approach – where located on high capacity public transport routes and for specific land uses that cannot be accommodated in town and city centres"¹.

Based on the above and the availability of existing 'Employment' zoned lands in more sequentially appropriate locations, the NTA would recommend that the Local Authority review the subject zoning

¹ Greater Dublin Area Transport Strategy, Chapter 8, Page 60.

and the available evidence base to support same in the context of current land use planning and transport planning policy and guidance.

It is also noted that the *Spatial Planning and National Road: Guidelines for Planning Authorities* (2012) state that in preparing development plans and local area plans, planning authorities must consider how proposed zoning objectives and the projected resulting trip demand are to be catered for, with a promotion of sustainable modes and while protecting the strategic function of the national road network.

Notwithstanding the proposed inclusion of an objective for concurrent active travel infrastructure to serve this location under MA no. 5, the NTA is concerned that any future development of trip-intensive employment use at this location would be primarily catered for by car, given the sites location, which is peripheral to the built-up-area of Arklow and the public transport network, and the adjacency of the national road network. Such a scenario could negatively impact on the strategic road network and would not the support the fulfilment of important local and national objectives that seek a reduction in emissions from the transport sector.

NTA Recommendation

The NTA recommends that the proposed zoning at Ballynattin, west of the M11, is reviewed against land use planning and transport planning policies and guidelines and, in the event that such a review demonstrates the appropriateness of the proposed zoning and it is subsequently brought forward, that an objective is included in the LPF which states that this site will only provide for specific forms of employment that cannot be accommodated in Arklow Town Centre, in accordance with the Transport Strategy.

I trust that the views of the NTA will be taken into account by the Council in the finalisation of the Arklow Local Planning Framework 2026.

Yours sincerely,



David Clements
Senior Land Use and Transport Planner