

	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:	Transport Infrastructure Ireland (TII)
Reference:	ARKPMA-172425
Submission Made	May 27, 2026 5:37 PM

Topic

LPF - Proposed Material Alterations No. 5 Submission

Submission

Please see attached submission. TII ref. TII26-136223. Thank you.

Topic

LPF - Proposed Material Alterations No. 15 Submission

Submission

Please see attached submission. TII ref. TII26-136223. Thank you.

Topic

LPF - Proposed Material Alterations No. 16 Submission

Submission

Please see attached submission. TII ref. TII26-136223. Thank you.

Topic

LPF - Proposed Material Alterations No. 22A Submission

Submission

Please see attached submission. TII ref. TII26-136223. Thank you.

Topic

LPF - Proposed Material Alterations No. 22B Submission

Submission

Please see attached submission. TII ref. TII26-136223. Thank you.

Topic

LPF - Proposed Material Alterations No. 23 Submission

Submission

Please see attached submission. TII ref. TII26-136223. Thank you.

Topic

LPF - Proposed Material Alterations No. 26 Submission

Submission

Please see attached submission. TII ref. TII26-136223. Thank you.

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TII26-136223 - Submission to material alterations to Draft Arklow Local Planning Framework __issued 27.05.2026.pdf, 0.4MB

Proposed Variation / Draft ARK LPF, Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town
County Wicklow

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

Dáta | Date
27 May 2026

Ár dTag|Our Ref.
TII26-136223 (previous ref. TII25- 133407)

RE: Proposed material alterations to Draft Arklow Local Planning Framework originally advertised as Variation No. 5 of the Wicklow County Development Plan 2022-2028

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) has reviewed the proposed Material Alterations to the Draft Arklow Local Planning Framework (LPF) originally proposed as Variation no. 5 of the current Wicklow County Development Plan 2022-2028. As the Council is aware, TII is responsible for the maintenance of safe and efficient operation of the national road network and the existing light rail network Luas.

As the Council is also aware, TII made submission to the Proposed Variation in October 2025. 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 set out in the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and the *Regional Spatial and Economic Strategy for the Southern Region* (RSES).

TII reminds that Future Luas, Metro and Bus Connects alignments are a matter for the National Transport Authority (NTA).

TII also continues to remind the Council that the implementation of all national road schemes / improvements / maintenance is subject to budgetary constraints and 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. TII reiterates that having regard to budget allocations, that there are currently no national roads schemes proposed in the vicinity of the Draft LPF area at this time.

Having regard to official policy and previous TII submissions, TII provides the following commentary in relation to Proposed Material Alterations of Variation No. 5 of the Wicklow County Development Plan.



Rezoning and land use material alterations to lands west of the M11 in the vicinity of M1 Junction 21 (Arklow South) – material alteration nos. 23 and 5

- Proposed Material Alteration no. 23 to Map No. 1 Land Use Zoning

Proposed material alteration no. 23 states as follows:

“Amend zoning of land at Ballynattin from Tourism ‘T’ (c. 17ha) to Employment ‘E1’ (c. 17ha).”

- Proposed Material Alteration no. 5 to Section B.4 Economic Development and Employment

Proposed material alteration no. 5 states as follows:

“Add new objective to EMPLOYMENT OBJECTIVES as follows:

ARK X 2 *Any future development of ‘Employment’ (E1) lands at Ballynattin located to the West of the M11, shall be accompanied by the delivery of active travel connectivity (pedestrian and cycle infrastructure) to Knockmore / public transport services on the east side of the M11.”*

TII highlights that in the context of official policy there is a requirement to carefully consider zoning and development proposals in the vicinity of the strategic national road network and associated junctions. Proposals for development and land use zoning designations at national road interchanges and junctions require careful consideration and any proposals should be prepared in the context of the provisions of Section 2.7 of the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities*.

In accordance with Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), particular care must be exercised in the assessment and management of development proposals in the Development Plan relating to development objectives or the zoning of locations at, or close to junctions on the national road network which should be subject to an appropriate evidence-base in accordance with the provisions of official national roads policy.

In accordance with Chapter 2 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), there are requirements to co-ordinate proposed land use zoning designations and / or access strategies in the Development Plan and accompanying settlement plans, as appropriate, with speed limits on national roads. Where large scale development in urban areas and / or areas adjoining national roads, including at major junctions and interchanges, is being considered Development Plans should ensure that the capacity on national roads is utilised appropriately and that such roads can continue to perform their intended function into the future by:

- ensuring such development is evidence based and supported by appropriate assessments of road capacity, junction structure and provision of suitable transport alternatives;
- protecting undeveloped lands adjoining national roads and junctions from development to cater for potential capacity enhancements;
- ensuring that capacity enhancements and or traffic management measures will be put in place to facilitate new development; and
- improving operational efficiency of the regional and local road and transportation infrastructure – e.g. where appropriate, promoting new regional and local road networks and alternative modes.

The Council is also advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising for the national roads network to accommodate local development proposals will be borne by the local authority. Such schemes will not be funded by TII. Thus, costs should be integrated within future local development contributions schemes.

TII is unable to find any record of consideration of appropriate evidence base for the proposed rezoning of a significant 17 hectares (ha.) of land at Junction 21 of the M11 (proposed material alteration no. 23) in the proposed material alterations documents. In addition, TII notes that this land use rezoning was not considered in the formulation of the accompanying Local Transport Plan (LTP), nor surprisingly has it been identified as requiring consideration in the supplied LTP review which accompanies the material variations

on display having been identified as having “*no direct impact*” in the LTP material alterations review. In addition, TII notes that section “A.3.2 Sustainable Transportation” of the Draft Local Planning Framework that provides a summary rendition of the LTP does not record any proposed material alteration to reflect a revision to indicate an assessment of the impact and management of the additional transport that will arise from the proposed material alteration rezoning.

TII is of the opinion that proposed material alteration no. 5 which proposes new objective “ARK X 2” is inappropriate in its current form as it proposes and encourages “.... *active travel connectivity (pedestrian and cycle infrastructure) to Knockmore / public transport services on the east side of the M11*”. TII highlights that there is no existing overbridge or underpass connection from the lands at Ballynattin west of the M11 with lands in Kincokmore east of the M11 nor do any appear proposed as part of the LTP measures that accompany the Draft Local Planning Framework for Arklow.

In this way, the proposed local transport routing which appears envisaged in proposed “ARK X 2” (material alteration no. 5) does not appear to exist. The utilisation of Junction 21 (Arklow South) to accommodate local traffic and sustainable travel access to Ballynattin is currently inappropriate and contrary to the function of the national road interchange, official national roads policy, and public safety. In its current form TII does not consider that proposed material alteration no. 5 (“ARK X 2”) is in the interests of the sustainable development of Arklow generally.

TII recommendation no. 1: Removal or revision of proposed material alteration nos. 23 (proposed rezoning of land at Ballynattin from Tourism ‘T’ to Employment ‘E1’ (c. 17ha) and no. 5 (proposed new employment objective ARK X 2)

The proposed *Employment* rezoning is expected to generate traffic at peak traffic times which would not arise from the current *Tourism* land use zoning. TII considers the absence of evidence base to support the proposed rezoning from *Tourism ‘T’* to *Employment ‘E1’* at Ballynattin as presented by material alteration no. 23 is contrary to Section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012). Any additional improvements relating to national roads identified at by Wicklow County Council should have been considered in consultation with, and subject to the agreement of TII and have been identified and assessed against an appropriate evidence base, in accordance with the requirements of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), national policy investment priorities and TII Publications.

Furthermore, TII is seriously concerned that proposed material alteration no. 5 for new employment objective “ARK X 2” which appears to seek to minimise impact of additional traffic generation for the rezoned lands on the M11 and Junction 21 by identifying local transport links would not be difficult to implement and deliver. TII are not convinced that the “AR X 2” objective proposed will operate to minimise the impact of the proposed rezoning.

Proposed new “roads objectives” related to Local Transport Plan (LTP) – material alteration nos. 15 and 16

- Proposed Material Alteration no. 15 to Section B.8 Physical Infrastructure

Proposed material alteration no. 15 states as follows:

“Add new objective to ROADS OBJECTIVES as follows:

ARK X 5 *To protect the strategic function of the N/M11 in accordance with Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.”*

TII recommendation no. 2: Repositing of proposed material alteration no. 15 (“ARK X 5”) to “Active Travel – Walking & Cycling Infrastructure Objectives” of Section B.8 Physical Infrastructure

TII is uncertain of the purpose of proposed material alteration no. 15 for “ARK X 5” if it is to appear as proposed under the heading “roads objectives” of the “Arklow Physical Infrastructure Objectives” of Section B.8 Physical Infrastructure of the Draft Local Planning Framework. There is already an existing “roads objective” “ARK 81” in exactly the same terms of proposed material alteration no. 15 (“ARK X 5”) under “roads objectives” of the Draft Local Planning Framework.

The proposed “measures” or “interventions” of the Local Transport Plan are stated to support the “recommendations” of the LTP. Proposed LTP “measures” relate to all modes of transport interventions not just roads and there is interaction of a number of those “measures” with the national roads network as identified in TII’s submission to the Draft Local Planning Framework / proposed Variation No. 5 in October 2025. TII notes, for example that proposed material alteration no. 28 to Map No. 6 Active Travel Strategy “to include new active travel route (ATX)” is to occur in part parallel to the M11 and therefore the requirements of both the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and TII Publications compliance will be engaged as may motorway maintenance boundary interactions. Having regard to the more than “roads objectives” impact of proposed LTP “measures”, TII observes that the positioning of proposed material alteration no. 15 (“ARK X 5”) to a position under “Active Travel – Walking & Cycling Infrastructure Objectives” of the “Arklow Physical Infrastructure Objectives” of Section B.8 Physical Infrastructure of the Draft Local Planning Framework is preferable than under “roads objectives”.

TII therefore recommends that proposed material alteration no. 15 (“ARK X 5”) should be moved to a position between *Active Travel – Walking & Cycling Infrastructure Objectives* “ARK 68” and “ARK 69”.

- Proposed Material Alteration no. 16 to Section B.8 Physical Infrastructure

Proposed material alteration no. 16 states as follows:

“Add new objective to ROADS OBJECTIVES as follows:

ARK X 6 *To support and promote the implementation of the recommended measures set out in the Local Transport Plan.”*

TII recommendation no. 3: Repositing of proposed material alteration no. 16 (“ARK X 6”) to “Active Travel – Walking & Cycling Infrastructure Objectives” of Section B.8 Physical Infrastructure

TII welcomes proposed material alteration no. and 16 (“ARK X 6”) for its clarification of the implementation of proposed LTP “measures” and its connection to the requirement by proposed material alteration no. 15 (“ARK X 5”) that the measures in their implementation will have regard to the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and observe compliance with TII Publications (Standards and Technical).

As at TII recommendation no. 2 above, TII notes that proposed material alteration no. and 16 (“ARK X 6”) is indicated to be inserted under the heading “roads objectives” of the “Arklow Physical Infrastructure Objectives” of Section B.8 Physical Infrastructure of the Draft Local Planning Framework. TII observes that the main LTP related objectives occur under the heading of *Active Travel – Walking & Cycling Infrastructure Objectives* of the “Arklow Physical Infrastructure Objectives” of Section B.8 Physical Infrastructure of the Draft Local Planning Framework.

In the interests of clarity and coherency for LTP “recommendations” (already at ARK 68), TII recommends that proposed material alteration no. and 16 (“ARK X 6”) should be moved to a position under proposed material alteration no. 15 (“ARK X 5”) to a position between *Active Travel – Walking & Cycling Infrastructure Objectives* “ARK 68” and “ARK 69”.

Rezoning material alterations to lands east of the M11 at Ballyraine and Lamberton – material alteration nos. 22(a), 22(b) and 26

- Proposed Material Alteration no. 22(a) to Map No. 1 Land Use Zoning and 22(b) for proposed Ballyraine SLO 6

Proposed material alteration no. 22(a) states as follows:

“Amend MAP NO. 1 LAND USE ZONING for lands at Ballyraine from Natural Areas ‘OS2’ (c. 6 ha) to New Residential ‘RN’ (c. 2.5 ha) and Natural Areas ‘OS2’ (c. 3.5 ha) and add new SLO boundary.”

TII notes that this area has been ascribed “SLO 6” with accompanying proposed material alteration no. 22(b) which states as follows:

“SLO 6 - BALLYRAINE

These lands measuring c. 6 ha are located in the townland of Ballyraine to the west of Arklow town centre and are zoned for new residential (RN – c. 2.5ha) and open space use (OS2 – c. 3.5ha). This area may be developed for a mix of uses including residential, community and open space uses, in accordance with the following requirements:

- a) Approximately 2 ha of this site, along the boundary with the M11 (zoned OS2), shall be reserved free of development (other than the lands required for the car parking required by part (e) to follow) and shall be dedicated to nature restoration in a manner to be agreed with the Planning Authority;*
- b) Approximately 0.7 ha of this site along the boundary of Lamberton Lane (zoned OS2) and corresponding to a 35m set back from the lane shall be reserved free of development and shall be dedicated to nature restoration in a manner to be agreed with the Planning Authority;*
- c) Any development shall safeguard and retain existing watercourses, wetlands, and ponds, incorporating them into the site design with the appropriate setbacks (in accordance with objective ARK63 and County Development Plan Objective CPO 17.26);*
- d) Any development shall ensure the retention and protection of all existing mature trees on site in accordance with County Development Plan Objectives CPO 17.20, 17.21, 17.22 and 17.23), in particular those identified on the drawing below, which shall be identified and evaluated by a qualified arborist in any application for development and justification provided where any removal is proposed;*
- e) A permeable surface car park adjoining Lamberton Lane of 20 No. spaces shall be delivered as part of any development on the OS2 zone along the M11 described in part (a) above. Said car park shall be accessed only from the south with pedestrian and cycling links to Lamberton Lane only (no vehicular access from Lamberton Lane will be considered).”*

- Proposed Material Alteration no. 26 to Map No. 1 Land Use Zoning

Proposed material alteration no. 26 states as follows:

“Amend MAP NO. 1 LAND USE ZONING for lands at Lamberton, as follows:

A: Change c. 0.3ha from ‘OS2 Natural Areas’ to ‘RN – New Residential’

B: Change c. 0.04ha from ‘RN - New Residential’ to ‘OS2 Natural Areas’”

TII observes that both proposed material alteration nos. 22 and 26 propose residential land use zoning in close proximity to the M11. The Council is reminded that TII will entertain no future claims in respect of impacts (e.g. noise and visual) on development arising on foot of proposed new land use zonings objectives, due to the presence of the existing road or any new road scheme which is currently in planning. In this regard, TII is unable to ascertain that the proposed material alteration zoning objectives provide

sufficient consideration and mitigation of potential impacts such as noise, air and light as part of the proposed residential land use zonings to ensure residential amenity of future residents and the protection of the maintenance of the safe and efficient operation of the M11 and its associated infrastructure. TII would refer to the requirements of Chapter 3, Section 3.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012).

Having regard to proposed new land use zoning objectives in the vicinity of the M11, the recognition of its presence and potential direct and indirect interactions of new development with the national road network is vital to ensure the compatibility of the safe and efficient operation of the national road network with the delivery of appropriate levels of residential amenity and safety. TII makes the following recommendation:

TII recommendation no. 4: Compatible development of residential zoned lands in the vicinity of the M11 with the function of the national roads network as proposed under material alteration nos. 22 and 26

TII recommends the inclusion of the following provision, or a provision to like effect in respect of proposed material alteration nos. 22 and 26

Residential development in the vicinity of the M11 shall incorporate noise mitigation measures identified as part of a noise assessment to accompany the development proposal. Mitigation measures arising shall be the sole responsibility of the developer as part of the recital development arising.

Conclusion

This submission is made in accordance with government policy to maintain and protect the safety and efficiency of strategic national road network complementary to development objectives of the draft Arklow LPF.

Having regard to the contents of this submission, if deemed required, TII remain willing to facilitate a meeting with the Council alongside the NTA to finalise the formulation of Draft LPF sustainable transportation proposals.

Please acknowledge receipt of this submission.

Yours faithfully,



Cliona Ryan
Land Use Planner