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By e.mail; planreview@wicklowcoco.ie

Dáta | Date
4 November, 2022

Ár dTag | Our Ref.
TII22-120473

Re. Draft Ministerial Direction: Wicklow County Development Plan, 2022 – 2028

Dear Sir/Madam,

TII acknowledges publication of the Draft Ministerial Direction on the Wicklow County Development Plan, 2022 - 2028.

The Council will be aware that TII submitted observations on the Proposed Material Alterations to the Draft Wicklow County Development, 2022 – 2028, and identified proposed new development and zoning objectives in the vicinity of the M11, national road, as being in conflict with the provisions of the Section 28 Ministerial Guidelines '*Spatial Planning and National Roads Guidelines for Planning Authorities*' (DoECLG, 2012).

In particular, TII identified Proposed Material Amendment ref. V1 – 33; a new Objective to provide for a Motorway Service Area at 'The Beehive', Coolbeg Cross (M11 Junction 18) and Proposed Material Amendment ref. V1 – 51; the introduction of a new Tourism Objective 'to provide for tourism development at Jack Whites' (M11 Junction 19).

TII acknowledges that the Chief Executives Report on the Submissions to the Proposed Amendments to the Draft County Development Plan, 2022 – 2028, recommends that the Development Plan should proceed without the adoption of the subject Material Alterations. However, based on the material available, it appears that the Development Plan has been adopted and includes the identified specific objectives, contrary to the recommendations of the Chief Executive. Clarification of this would be appreciated.

In addition to comments on the Proposed Material Alterations, TII had identified a number of other provisions included in the Draft Plan considered to be at variance with the provisions of the Section 28 Ministerial Guidelines '*Spatial Planning and National Roads Guidelines for Planning Authorities*' (DoECLG, 2012), in particular, Objective CPO 9.15 which provided for employment development at specific locations identified at national road junctions.

In relation to the designation of such sites at Kilpedder Interchange, at Mountkennedy Demesne, Kilpedder and at Inchanappa South and Ballyhenry, Ashford, TII recommended that an exercise be undertaken to evaluate and amend Employment Development Zonings Map ref. 09.01 (Mountkennedy Demesne, Kilpedder) Map ref. 09.02 (Kilpedder Interchange); Map Ref. 09.03 (Ashford) to demonstrate that the zoning proposals are consistent with the requirements of the DoECLG Guidelines and the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed prior to adoption into the new Development Plan.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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Although the proposed development objectives, referenced in the foregoing, appear to be included in the adopted Development Plan, none are addressed in the proposed Ministerial Direction. Nevertheless, TII advises that the comments made in relation to the identified development objectives at national road junctions included in the Draft Plan and the Proposed Material Alterations to the Draft Plan, remain the position of TII.

The Council will be aware of the critical need to manage national road assets and associated junctions in accordance with official Government policy as outlined not only in the DoECLG Spatial Planning and National Road Guidelines for Planning Authorities, but also the TEN – T Regulation (EU) No 1315/2013, the National Planning Framework, the National Development Plan and the National Investment Framework for Transport in Ireland.

Government policy has set out the key sectoral priority, included in the National Development Plan, 2021 – 2030, of maintaining Irelands existing national road network to a robust and safe standard for users.

This priority is reflected in the National Investment Framework for Transport in Ireland (NIFTI) which outlines the investment hierarchy of maintaining and optimising transport assets before investment in improvements or new infrastructure is considered. NIFTI also acknowledges that preserving key strategic links will help deliver the necessary capacity on surface access routes to ports and airports and promote balanced regional development.

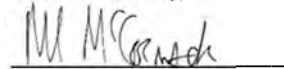
Further, the Eastern and Midland Regional Authority Regional Spatial and Economic Strategy, 2019 – 2031, includes the objective of maintaining and protecting the strategic transport function of national roads and associated junctions as a guiding principle for the integration of land use and transport planning.

The subject sites do not appear to support compact growth and do not appear well served by active travel and public transport, as such, they also appear to be inconsistent with the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035.

While TII acknowledges the Chief Executive Recommendation not to proceed with certain elements of the above identified Proposed Material Alterations, TII remains of the opinion that the identified proposals providing for employment development, a Motorway Service Area objective and a Tourism objective at locations at national road junctions conflict with the provisions of official policy, as outlined above, including the Section 28 Ministerial Guidelines '*Spatial Planning and National Roads Guidelines for Planning Authorities*' (DoECLG, 2012) and the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035.

I trust the foregoing is of assistance and is taken into consideration in the assessment of submissions received in relation to the Draft Ministerial Direction on the adoption of the Wicklow County Development Plan, 2022 - 2028.

Yours sincerely,



Michael McCormack
Senior Land Use Planner