

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
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Who are you:	State Body
Name:	Transport Infrastructure Ireland (TII)
Reference:	GDKLPF-121432
Submission Made	June 18, 2025 12:19 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole
- A.3 Factors influencing future development options

Local Planning Framework PART B Settlement Specific Objectives.

- B.7 Infrastructure, including transport and flooding
- Other topics

Write your observations here:

Please see attached TII submission ref. TII25-131470 which relates to the draft LPF area encompassing Greystones-Delgany and Kilcoole.

Please select which town you want to comment on:

Greystones/Delgany, Kilcoole

Observation relevant to the settlement:

Please see attached TII submission ref. TII25-131470 which relates to the draft LPF area encompassing Greystones-Delgany and Kilcoole.

Upload a File (optional)

Proposed Variation No. 4_Draft Greystones – Delgany & Kilcoole LPF 2025
_submission_TII25-131470_ issued 18.06.2025.pdf, 0.41MB

Variation No.4
Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

Online submission: <https://greystones-delgany-kilcoole-lap-wicklow.hub.arcgis.com>

Dáta | Date 18 June 2025

Ár dTag | Our Ref. TII25-131470

**Re: Proposed Variation No. 4 To Wicklow County Development Plan 2022-2028
Draft Greystones – Delgany & Kilcoole Local Planning Framework 2025**

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) welcomes notice of the preparation of a new local land-use plan (a Local Planning Framework) for the towns of 'Greystones-Delgany' and 'Kilcoole' by Wicklow County Council. The draft Greystones-Delgany and Kilcoole Local Planning Framework (LPF) is the subject of proposed Variation no. 4 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. TII reminds the Council that the N/M11 west of draft LPF area is a vital part of the national road network and part of the European TEN-T Comprehensive Network. 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.

TII notes that the draft LPF is to replace the Greystones-Delgany and Kilcoole Local Area Plan 2013 – 2019. TII made submission to the pre-draft consultation for a Greystones-Delgany & Kilcoole Local Area Plan (LAP) under TII ref. TII23-125355 in January 2024. As at the TII submission to the pre-draft stage of the existing LAP review, TII reiterates:

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 *Wicklow 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. CPO 12.40 expressly recognises the the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012). TII notes that the proposed Variation No. 4 of the County Development Plan does not alter these existing *National Road network Sustainable Transportation* County Plan Objectives (CPOs) of the County Development Plan.

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/>.

By review of the draft LPF maps, particularly *Map No. 1 Land use Zoning Objectives* and *Map No. 5 Transport Strategy*, TII notes that the boundary of the draft LPF area does not extend to directly interact with the N/M11 corridor, including junctions. The single indicated direct interaction with the N/M11 is indicated on Map No. 5 “*Improved Pedestrian and Cyclist Infrastructure*” proposed as objective ref. GDK 59C for the local Woodstock Road which runs under the N11.

The following TII observations on the draft LPF 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 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 Draft LPF, 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 Greystones–Delgany and Kilcoole.

The TII submission to the pre-draft stage of the previous LAP review recommended that land use transportation assessment for any future LAP, now a Local Planning Framework (LPF), 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 existence and inclusion of *Appendix 6 Infrastructure Assessment & Implementation Programme* of the draft LPF that includes TII as a named stakeholder at section 2 *Key Stakeholders*, subsection 2.2 *Roads & Transportation Infrastructure*. Subsection 3.3 *Transportation & Movement* opens with a description of the progression of the “*Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)*” stating that the Study is to become the *Local Transport Strategy* which is “*still in development*”. It is stated that some “*stages /tasks*” of the Study to become the Local Transport Strategy have been completed and have been utilised to “*inform both the overall development strategy of the LPF but also the roads and transportation objectives.*” This *Appendix 6* subsection closes with a section entitled “*Proposed Greystones-Delgany and Kilcoole LPF Transport Objectives*” consisting of an image of draft LPF *Map No. 5 Transport Strategy*. TII notes that the “*Greystones-Delgany & Kilcoole Transport Study (WCC / NTA)*” as set out in *Appendix 6* of the draft LPF is part transposed into the written statement of the LPF at section A.3 *Factors Influencing Future Development Options*, subsection A3.1 *Sustainable Transportation*.

Having regard to the above, including the statement that of the commitment to the preparation of a “*Local Transport Strategy for Greystones- Delgany and Kilcoole*” at Appendix 6 and section A3.1 *Sustainable Transportation* of the draft LPF, TII highlights the following:

- The draft LPF includes footnotes for the *Local Transport Strategy* (LTS) stating “*The aim of this LTS is to establish a strategic framework for the future development of transport infrastructure in the area.*” TII has been aware of the undertaking of an Area Based Transport Assessment (ABTA) as Wicklow County Council previously invited TII stakeholder engagement in the preparation of an ABTA for Greystones–Delgany and Kilcoole in 2022 (TII ref. TII22-117038). The transportation study information presented in the draft LPF represents the first update of this process that TII has been apprised of since initial engagement in 2022.

Having regard to the contents of the draft LPF, TII is unable to ascertain the methodology to be employed by the County Council in the preparation of the proposed *Local Transport Strategy for Greystones- Delgany and Kilcoole* and is therefore of the opinion that the draft *Local Transport Strategy* 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 Greystones–Delgany and Kilcoole.

- The draft LPF *Infrastructure Objectives* (GDK59 to GDK 64) appear to omit the commitment to the preparation of the *Local Transport Strategy*. Furthermore, there appears to be strong reliance on the already in progress Transportation Study, which is to become the *Local Transport Strategy*, for the development options, *Transport Strategy Map No. 5* and the *Infrastructure Objectives* presented in the draft LPF. Having regard to this reliance and stated intention to complete a *Local Transport Strategy*, TII is of the opinion it is in order that the preparation of the *Local Transport Strategy* be included amongst the *Infrastructure Objectives* of the LPF.

TII Recommendation 1:

Commitment to the preparation and clarification of the role of the draft LPF *Local Transport Strategy* having regard to the requirement under County Development Plan *Sustainable Mobility Objective CPO 12.3* for the preparation of an LTP for Greystones–Delgany and Kilcoole.

TII recommends that the forthcoming draft LPF proposed *Local Transport Strategy* for Greystones- Delgany and Kilcoole is recorded as committed to following the established ABTA methodology set out in NTA/TII Guidance.

TII also strongly recommends that the current set of draft LPF *Infrastructure Objectives* running for GDK58 to GDK64 include a grounding objective clearly committing to the preparation of the *Local Transportation Strategy*.

In this regard, TII recommends a review and revision of the proposed LPF text and / or *Infrastructure Objectives* to include a dedicated Objective for the undertaking of the proposed *Local Transport Strategy* in accordance with the ABTA methodology and takes account of policy and interactions with national road networks infrastructure.

2.0 Draft *Infrastructure Objectives* in Section B.7 *Infrastructure* of the draft LPF

The indicated extent of *Infrastructure Objectives* of the draft LPF on Map No. 5 *Transport Strategy* that will create interactions with the N11. In addition, the upcoming proposed *Local Transport Strategy* may create interactions with the national road network. Therefore, TII strongly recommends explicit recognition of official national roads development policy and TII Publications amongst the *Infrastructure Objectives* of the LAP to ensure timely Local Transportation Strategy consultation with TII and 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 proposed “GDK 59C” indicated on draft LPF Map No. 5 *Transport Strategy* is indicated to run under the M11 and appears to be described in section B.7 *Infrastructure and Services* of the draft LPF as one of the “*Greystones- Delgany and Kilcoole Infrastructure Objectives*” as follows; “GDK59” is “*To support and facilitate the implementation of local projects which improve pedestrian and cyclist permeability, safety and access to schools and public transport. In particular to support and facilitate the following schemes / programmes:*” that include provision “*c) Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkennedy*”.

Having regard potential national road network interactions identified in this submission, TII recommends that any proposed LPF 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 this regard and notwithstanding footnote 25 of the draft LPF for the “*Greystones- Delgany and Kilcoole Infrastructure Objectives*” which summarily appears to advise that objectives not yet permitted will be subject to design and development management reviews, TII reminds that any alterations to the local Woodtsock Road as a result of “GDK 59C” will be required to have regard to the fact that the road travels an N11 overbridge (Eirspan Structure Name: Kilcoole Road Underpass, Structure ID: WW-N11-051.00). This N11 overbridge is a TII Structure, therefore compliance with TII Publications (Technical and Standards) is required and consultation with TII Structures may arise for the implementation of proposed objective “GDK 59C”.

TII Recommendation 2:

Revision of proposed draft LPF *Infrastructure Objective GDK 59* to reflect official national roads policy and for the requirements of TII Publications for works potentially impacting the national road network.

Revision of Infrastructure Objective GDK 59 in at section *B.7 Infrastructure* to include additional objective (t) as follows:

*“(t) 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.”*

Conclusion

The contents of this submission accord with existing national, regional and local development policy and objectives related to the national road network and seek to advance the proposed Greystones-Delgany and Kilcoole LPF Variation N. 4 of the County Development Plan in a manner compatible with the maintenance of the safe and efficient operation of the national road network.

Having regard to previous TII submissions to the Pre-Draft stage of the LAP review (TII ref. TII23-125355), previous stakeholder engagement in the preparation of an ABTA by the County Council (TII ref. TII22-117038), 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 faithfully,



Cliona Ryan
Land Use Planner