



# Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

<b>Who are you:</b>	State Body
<b>Name:</b>	Tara Spain
<b>Email Address:</b>	LandUsePlanning@tii.ie
<b>Reference:</b>	GDKLAP-151822
<b>Submission Made</b>	January 17, 2024 3:37 PM

## File

TII23-125355 - Greystones-Delgany \_ Kilcoole Local Area Plan pre-draft consultation  
Jan 2024.pdf, 0.34MB



Bonneagar Iompair Éireann  
Transport Infrastructure Ireland

**Administrative Officer**  
**Planning Department**  
**Wicklow County Council**  
**County Buildings**  
**Station Road**  
**Wicklow Town**  
**A67 FW96**

Online submission via portal

**Dáta | Date**

17-1-2024

**Ár dTag | Our Ref.**

TII23-125355

**RE: - Greystones-Delgany & Kilcoole Local Area Plan pre-draft consultation**

Dear Administrative Officer,

TII welcomes notice of the preparation of the pre-draft consultation Greystones-Delgany & Kilcoole Local Area Plan. Transport Infrastructure Ireland's (TII) mission is to deliver transport infrastructure and services, which contribute to the quality of life for the people of Ireland and support the country's economic growth. TII safeguards the strategic function of Luas and National Roads to promote the safe and efficient operation of both the light rail and national roads networks.

Our comments and recommendations on the issues for consideration for the Pre- Draft Consultation are as follows:

**1. MANAGING EXCHEQUER INVESTMENT AND STATUTORY GUIDANCE**

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport, co-ordinated to achieve integrated and intermodal long-distance travel routes across Europe.

The M/N11 corridor is a strategic road corridor of national significance providing access to the south east of the country, in addition to providing access to international markets for freight and tourist traffic through Rosslare Euro-port. The Council will be aware that the national primary road corridor is identified as part of the TEN-T Comprehensive Network. Such a designation has repercussions and action requirements for policies and objectives which should be considered in the preparation of the Local Area Plan especially with regard to impacts on M11 junctions 9,10, and 11 to the east of existing zoned area.

The international dimension is reflected in the Eastern and Midland Assembly Regional Spatial and Economic Strategy (EMRA RSES) Regional Policy Objective RPO 8.16.

*RPO 8.16: Support the improvement and protection of the TEN-T network to strengthen access routes to Ireland's ports, including investment in the ongoing development of the N11/M11 to improve connectivity to Rosslare and improvements to the Dublin-Wexford Rail line.*

It is of particular importance that policies and objectives are drafted which allow the network of national roads including the M11 and its associated junctions to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve economic competitiveness and regional

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
TII processes personal data in accordance with its Data Protection Notice available at [www.tii.ie](http://www.tii.ie).



Bonneagar Iompair Éireann  
Ionad Gnó Gheata na Páirce  
Sráid Gheata na Páirce  
Baile Átha Cliath 8  
Éire, D08 DK10



Transport Infrastructure Ireland  
Parkgate Business Centre  
Parkgate Street  
Dublin 8  
Ireland, D08 DK10



[info@tii.ie](mailto:info@tii.ie)



[www.tii.ie](http://www.tii.ie)



+353 (0)1 646 3600



+353 (0)1 646 3601

accessibility by providing faster, more efficient, and safer access to and from our major ports, airports, cities and large towns.

There is a critical need to manage these assets in accordance with national and regional policy as outlined in , the provisions of the, Project Ireland 2040, National Investment Framework for Transport in Ireland (NIFTI), Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), RPO 8.1 RPO 8.2 , *RPO 8.3* and *RPO 8.16* of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (EMRA RSES) and NTA *Greater Dublin Area Transport Strategy 2022-2024* including Measure ROAD2.

TII requests that the future plan reflects the foregoing provisions of official policy and national objectives in relation to spatial planning and national roads.

## **2. PLANNING FOR DEVELOPMENT AND NATIONAL ROADS**

As demonstrated in this submission, the Authority seeks to ensure that the carrying capacity, operational efficiency, safety, national investment made and being made in the M11 national roads assets (including junctions) in this area continue to be safeguarded and that the relevant policies/objectives included in the draft are developed to reflect this.

In accordance with Government policy, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development being framed within a coherent integrated land use and transportation strategy. The Authority respectively points out that although a requirement may be identified for the development of a particular location, any local transport function of national roads in respect of such areas is, and must continue to be, secondary to the role of these roads in catering for strategic traffic. Such an approach, consistent with the provisions of official policy, supports access to markets and economic growth. In addition, proposals should not be developed that are to the detriment of the investment in national infrastructure, by eroding or undermining that investment, which is required to service the Country's major inter-urban and inter-regional transport requirements and underpins economic competitiveness.

The Authority recommends that residential, retail, and employment objectives especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by public transport, foot, and private car so that the variety of residential, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society. In TII's opinion, the co-ordination of land use planning and transportation will be a critical to achieving the complementary objectives of compact urban growth while safeguarding the strategic function of the M/N11 Corridor.

### **a. Development at national road junctions**

Safeguarding the strategic inter-urban and inter-regional function of national roads, as outlined above, it will be important for the Council to exercise particular care in their assessment and management of development proposals in the plans 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.

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. The Council will also be aware that Section 8.3 of the EMRA RSES outlines the policy to apply the guiding principle that the strategic transport function of national roads and associated junctions should be maintained and protected in statutory land use plans.

As indicated in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) where planning authorities propose large scale development in urban areas and or areas adjoining national roads, including major junctions and interchanges, 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:

- 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 to the national roads network to accommodate local development proposals will be borne by the local authority and will not be funded by TII and thus should be integrated within future local development contributions schemes.

Draft policies should reflect and safeguard the strategic role of the national road network and associated junctions in catering for the safe and efficient movement of inter-urban and inter-regional traffic. Planning authorities, in considering proposals for zonings adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres.

#### **b. Evidenced Based Approach to Development**

In TII's opinion, careful consideration and the preparation of appropriate evidence-based analysis are required to ensure the continued development of Greystones-Delgany & Kilcoole within the region and other settlements in the County complementary with maintaining the strategic transport function of national roads and associated junctions.

It should be noted that whilst the Authority recommends that traffic and transport assessments be carried out for individual planning applications as part of the development management process, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the overall transport assessment of areas to individual applicants' transport assessments is considered highly inappropriate and would lead to a piecemeal and unsustainable approach to development in the vicinity of the strategic national road network. Such an approach is particularly relevant for planned growth areas in the County and within the higher tiered settlements.

It is the Authority's opinion that the Council should consider undertaking appropriate Area Based Transport Assessment to support the preparation of the Draft County Development Plan, 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 is requested that TII be formally engaged in any ABTA process to be undertaken to inform the Draft LAP.

TII would welcome consultation with the Council in relation to such proposals where there may be implications for the national road network.

### **3. TRANSPORT PLANNING , NATIONAL ROAD NETWORKS MAINTENANCE AND SAFETY**

The Authority's priority in relation to national roads in this area are the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date. TII has responsibility for the co-ordinated maintenance and renewal of sections of the strategic national road network, on behalf of local road authorities, through a combination of (Public Private Partnerships) PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII.

TII acknowledges that the Council may consider it appropriate to identify local improvements adjacent or to the national roads network that may be incorporated into the adopted plan. The Authority advises that while any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements.

TII highlights that it is critical the local authority appropriately manages any potential interface with the national road network in view of the need to safeguard the network and associated infrastructure such as bridges, gantries,

telemetry, lighting, or underpasses that are designed for the network and cannot facilitate other development proposals.

The impact and mitigation of works that may arise from the Local Area Plan, either by virtue of location adjacent to, or within the motorway boundary of the M11 that includes its junctions, or cumulative impact on its services, must be identified and assessed by TII ahead of the making of the LAP.

TII advises that prior consultation with TII and compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) will be required for any work that may impact the national road network including pavement, structures and infrastructure including drainage. Such consultation will include MMarC Contractor to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained. In addition, any additional connectivity to national roads should be developed in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012).

Related to the foregoing, the Authority requests the inclusion of policies and objectives in the Development Plan that provide for the following:

- objectives providing for development of the relevant national road schemes,
- a policy to protect routes of national road schemes free from adverse development that may compromise the development of route options or the construction of preferred routes, or add to the overall costs associated with proposed schemes.

The Council will be aware that the implementation of all national road schemes is subject to budgetary constraints and is subject 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.

#### **4. CONCLUSION**

Having regard to the critical strategic transport role of the N/M11, its demarcation of the Draft LAP eastern boundary and the potential impacts of objectives of the LAP on the maintenance the safety, capacity and strategic function of the national road network, TII requests that it is recognised as an important stakeholder in the draft LAP process and that the Draft LAP will reflect the provisions of the DoECLG's Spatial Planning and National Roads Guidelines for Planning Authorities.

The Authority is as always available to meet the Executive of the Council to further discuss the issues raised in this correspondence at your earliest convenience . Please acknowledge receipt of this submission.

Yours sincerely,



-----  
Tara Spain,  
Head of Land Use Planning.