



# Arklow Local Area Plan Submission - Report

<b>Who are you:</b>	State Body
<b>Name:</b>	Transport Infrastructure Ireland (TII)
<b>Email Address:</b>	[REDACTED]
<b>Reference:</b>	ARKLAP-121506
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## File

TII submission to Arklow and Environs LAP\_ pre-draft - 2024\_re-issued 19.03.2024\_TII ref. TII24-126442.pdf, 0.24MB

## ARKLOW LOCAL AREA PLAN PRE-DRAFT CONSULTATION

Administrative Officer  
Planning Department  
Wicklow County Council  
Station Road  
Wicklow

Dáta | Date  
15/03/2024

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TII24-126442

### Re: ARKLOW LOCAL AREA PLAN PRE-DRAFT CONSULTATION

To whom it may concern,

Transport Infrastructure Ireland (TII) welcomes notice of the commencement of the preparation of Arklow Local Area Plan Pre-Draft Consultation. TII's 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. One of TII's core functions is to maintain the strategic function of National Roads to promote the safe and efficient operation of the national roads networks in accordance with Government policy. The Arklow local plan area is bounded by the M11 and associated Junctions 20 and 21).

TII's observations, provided in the following submission, seek to address the safety, capacity, and strategic function of the national road network in accordance with TII's statutory function and the provisions of official policy. To that effect, TII provides the following recommendations for the Council's consideration:

1. The M11/N11 is a highly important national road and provides the dominant means of 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 and via the M50 through Dublin Port and Airport. The M50 also provides onward connection from the M11 to other national road radial routes.

The Council will be aware that the N/M11 Dublin to Rosslare route is identified as part of the TEN-T Comprehensive Network. 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 in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe. The repercussions and action requirements of the TEN-T regulations for policies and objectives should be considered in the preparation of the new Local Area Plan.

There is a critical need to manage these assets in accordance with national policy as outlined in the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) the guiding principles of the transport strategy of the RSES at Regional Policy Objective (RPO) 8.1 as well as RPO 8.2 and the NTA's Transport Strategy for the Greater Dublin Area

Overall TII, NTA and planning authorities must manage development which could have an impact on the national road network and ensure appropriate mitigation measures are included for potential development areas in a plan led and evidence-based manner.

It is of particular importance that policies and objectives are drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic competitiveness by providing faster, more efficient, and safer access to and from our major ports, airports, cities and large towns.

2. TII recommends an evidence-based approach to planning policy is vital to ensure an integrated approach to the design of development areas that includes a set of principles and criteria designed to ensure a high standard of access by public transport, foot, and private car as well as cognisance of the management of strategic transport requirements for people, goods and services on the national road network. Given the location, nature, and scale of the Arklow it is recommended that either a Local Transport Plan or Area Based Transport Assessment (ABTA) is concurrently prepared with the LAP.

Local Transport Plans should follow a methodology based on the TII/NTA Area Based Transport Assessment (ABTA) Guidance, originally published in 2018 that now consists of the NTA's ABTA Advice Note, ABTA Pilot Methodology and Templates and TII Publications ref. PE-PDV-02046 ABTA Guidance Notes.

3. The national road network includes its junctions. Taking account of the existing national road network including the considerable investment made in national roads with respect to the M1 and associated junctions, TII considers that it is essential that the preparation of the proposed Local Area Plan is guided by the requirements of the Section 28 DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and TII Publications.

Having regard to previous zoning designations in the Arklow Environs area in proximity to M11 junctions, Wicklow County Council is requested to exercise particular care in the assessment and management of development proposals relating to the zoning of locations at or close to junctions on the M11/N11, where such development could generate significant additional traffic, thereby compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the unacceptable reduction in the level of service available to road users.

When considering proposals for zoning designations adjacent or close to existing or planned national roads/motorways and junctions, regard should be had to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres. In particular, policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, including junctions, by measures intended to cater for the needs of local traffic which should more appropriately be addressed within the framework of providing an adequate local road infrastructure.

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. 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. Thus, it is critical that zoning proposals in proximity to national road junctions, if included in the local area plan, are supported by a required evidence base to demonstrate that the additional traffic loading can be satisfactorily accommodated at the junctions concerned while safeguarding the strategic function of the national road network. as advocated by the guidance note on Area Based Transport Assessments published by the NTA/TII.

TII strongly recommends that review of the existing and potential zoning designations in the Arklow Environs area in proximity to M11 junctions should form part of any Local Transport Plan and/or Area Based Transport Assessments undertaken for the Local Area Plan to assist the

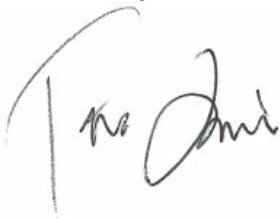
planning authority in determining fundamental issues of land use and transportation for these areas.

4. TII recommends that consideration is given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines into the local area plan concerning specific objectives relating to Traffic and Transport Assessment, Road Safety Audit, Environmental Noise requirements and Signage, etc.
5. TII has a limited remit, designated by the Department of Transport, which includes greenways and the development of a plan for an inter-urban cycle network, recently published as the National Cycle Network Plan (NCN). Therefore, in relation to any Greenway and National Cycle Network Plan (NCN) proposals in the vicinity of the LAP, consultation with the local authority internal project and/or design staff is recommended.

Having regard to the contents of this submission, Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities (2012), the critical location of Arklow relative to the national road networks that include national road junctions, and objectives, TII emphasises its availability to meet the executives the County Councils with the NTA to discuss any issues arising in the foregoing.

Please acknowledge receipt of this submission in accordance with the provisions of the Planning and Development Regulations, 2001 as amended.

**Yours faithfully,**



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**Head of Land Use Planning**