



Greystones - Delgany & Kilcoole Draft LPF Amendment Stage Submission - Report

Who are you:	State Body
Name:	Transport Infrastructure Ireland (TII)
Reference:	GDKLPF-163353
Submission Made	November 12, 2025 4:39 PM

Topic

LAP - Proposed Material Amendments No 12 Submission

Submission

Please see TII submission attached (TII ref. TII25-131470)

Topic

LAP - Proposed Material Amendments No 13 Submission

Submission

Please see TII submission attached (TII ref. TII25-131470)

Topic

LAP - Proposed Material Amendments No 16 Submission

Submission

Please see TII submission attached (TII ref. TII25-131470)

Topic

LAP - Proposed Material Amendments No 35 Submission

Submission

Please see TII submission attached (TII ref. TII25-131470)

Topic

LAP - Proposed Material Amendments No 36 Submission

Submission

Please see TII submission attached (TII ref. TII25-131470)

File

Draft Greystones Delgany Kilcoole Local Planning Framework 2025_material alterations
submission_TII ref.TII25-131470_issued 12.11.2025.pdf, 0.33MB

Variation No.4 / draft GDK LPF
Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

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

Dáta|Date 12 November 2025

Ár dTag|Our Ref. TII25-131470

Re: Proposed Material Alterations to the draft Greystones-Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 To Wicklow County Development Plan 2022-2028

Dear Administrative Officer,

Transport Infrastructure Ireland (TII) has reviewed the proposed Material Amendments to the Draft Greystones-Delgany & Kilcoole Local Planning Framework (Draft LPF) intended to form Variation no. 4 of the Wicklow County Development Plan 2022 – 2028.

TII made submissions to the pre-draft consultation for a Greystones-Delgany & Kilcoole Local Area Plan (TII23-125355, January 2024) and to the Draft Local Planning Framework (TII25-131470, June 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 outlined in the Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), in accordance with *Project Ireland 2040*, the EMRA *Regional Spatial and Economic Strategy* (RSES), the NTA *Greater Dublin Area Transport Strategy 2022-2042* and having regard to the provisions 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 and reminds that, as the Council is aware, 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.

Having regard to official policy, TII submission to the Draft LPF, and the *Proposed Material Amendments to the draft Greystones-Delgany & Kilcoole LPF*, TII provides the following commentary in relation to Proposed Material Alterations:

1.0 Proposed material alteration no. 16 to Draft LPF Chapter B.7 Infrastructure & Services

Proposed amendment no. 11 proposes a new Transportation development objective as follows:

“GDK – XX

In collaboration and with the support of the relevant transport agencies, to prepare a Local Transport Plan for Greystones-Delgany and Kilcoole LPF and integrate its provisions into the LPF as appropriate.”

TII's original submission to the Draft LAP highlighted the prescribed necessity for a Local Transport Plan (LTP) to be prepared for Greystones–Delgany and Kilcoole and made recommendation to like effect, TII endorses proposed material alteration no. 16.

TII notes that the “*Transport Strategy*” of the draft LPF is fundamentally linked to *Appendix 6 Infrastructure Assessment & Implementation Programme* of the draft LPF. TII is 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*”.

In this regard, TII notes that proposed Material Alteration nos. 35, 36 and 37 pertain to Draft LPF *Appendix 6: Infrastructure Assessment and Implementation Programme*.

- Proposed Material Alteration no. 35 is an “*additional Delgany Footpaths map*” which appears to indicate existing footpaths immediately adjacent N11 Junction 10 (Delgany) and potentially within the Motorway Maintenance and Renewal Contract (MMaRC) Network Area A.
- Proposed Material Alteration no. 36 pertains to the “*Implementation & Infrastructure Delivery Schedule Table*” where TII notes the retention unchanged of the intention to implement “*Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkennedy.*”

TII observes the intention of the additional proposed transportation development objective the subject of proposed Material Alteration no. 16, to incorporate the Local Transport Plan (LTP) “*provisions*” into the Local Planning Framework. TII reiterates the recommendation that the LTP be undertaken in accordance with established Area Based Transport Assessment (ABTA) methodology set out in Joint NTA/TII Guidance.

Having regard to joint TII / ABTA Guidance, the potential for the future LTP provisions to interact with the national roads network and TII's Draft LPF status as a transportation “*key stakeholder*”, TII requests that it be formally engaged in any Local Transport Plan (LTP) to be undertaken.

2.0 Proposed material alteration nos. 12, and 13 to Draft LPF Map No. 5 and to amend Infrastructure Objective GDK 59

TII acknowledges the proposed material alterations includes a Draft *Map 5 Proposed Altered Transport Strategy*.

TII's submission to the Draft LPF identified that previous *Map No. 5 Transport Strategy* identified objective “*GDK 59C*” “*Improved Pedestrian and Cyclist Infrastructure*” for the local Woodstock Road running under the N11. Due to this indicated direct interaction with the N11, TII submission to the Draft LPF recommended the revision of proposed draft LPF *Infrastructure Objective GDK 59* to include a specific provision reflect official national roads policy and compliance with TII Publications for works potentially impacting the national road network.

The revised Map No. 5 appears to indicate a shortened “*GDK 59C*” objective that does not run under the N11. In respect of the Draft LPF text of *Infrastructure Objective GDK 59*, TII notes that:

- The proposed material alterations for *Infrastructure Objective GDK 59* do not appear to include TII's recommendation for alteration of *Infrastructure Objective GDK 59* text.

- Material Alteration nos. 12 and 13 relate to *Infrastructure Objective GDK 59*, each consisting of an alteration to Map no. 5 (routes GDK 59B and GDK 59G and GDK 59T) appear with matching alterations to the text of the paragraphs under *Infrastructure Objective GDK 59*.

Having regard to the above, it appears to TII that the draft LPF appears to retain development objectives that will interact with the N11 as:

- The shortened extent of proposed “*Improved Pedestrian and Cyclist Infrastructure*” “*GDK 59C*” as indicated on Draft Map 5 *Proposed Altered Transport Strategy* does not have matching alterations to the text of the draft LPF.
- GDK 59 “c) *Pedestrian and cycling infrastructure from Kilcoole to Newtownmountkennedy*” is unaltered as a “*scheme / programme*” to be supported and facilitated under *GDK 59*.
- The Kilcoole to Newtownmountkennedy pedestrian and cycling infrastructure also remains on the *Implementation & Infrastructure Delivery Schedule Table* of Appendix 6.

Clarity is required on the actual development implications related to the material alterations proposed for *Infrastructure Objective GDK 59*.

TII reminds that any alterations to the local Woodstock Road as a result of “*GDK 59*” provision c) linking Kilcoole to Newtownmountkennedy will be required to have regard to the fact that the road travels under 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 works arising.

TII therefore continues to reiterate that any works arising from the implementation of Draft LPF or forthcoming Local Transport Plan (LTP) provisions that interact with the national road network will be required to have regard to official policy set out in the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and demonstrate compliance with TII Publications.

Conclusion

In relation to the Proposed Material Alterations on display, TII respectfully requests that the foregoing observations are taken into consideration by the Council prior to finalising the Local Planning Framework (LPF) to ensure that the LPF provisions accord with proper planning and sustainable development where development interfaces with the national road network.

TII reiterates its availability and willingness to continue to progress the Local Transport Plan (LTP) now a proposed transportation objective by proposed material alteration no. 16 of the draft LPF.

Please acknowledge receipt of this submission.

Yours faithfully,



Cliona Ryan
Land Use Planner