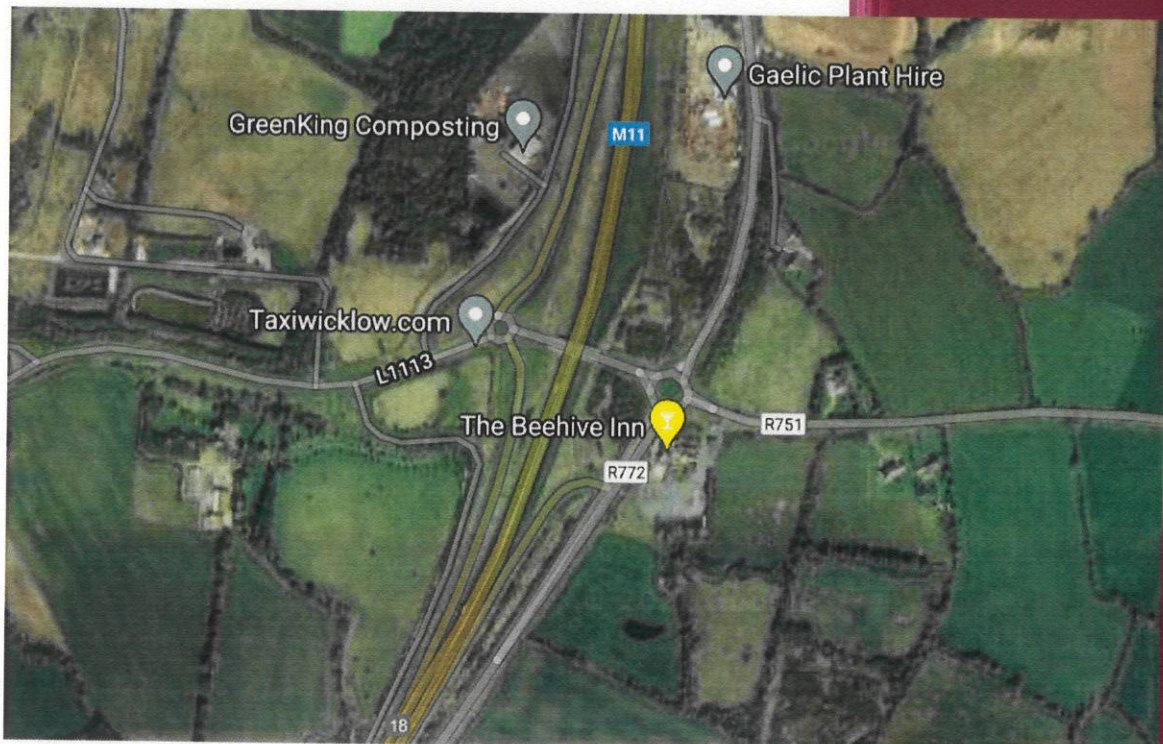


WICKLOW COUNTY COUNCIL
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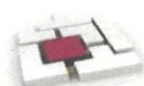
Development Plan Submission



Draft Wicklow Development Plan 2021-2027 (Stage 2)

Motorway Service Area proposal

On behalf of: Charles O'Reilly Hyland



downey
PLANNING

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Executive Summary

- This submission is made by Downey Planning, on behalf of our client Charles O'Reilly Hyland, and is submitted to Wicklow County Council in the context of the Draft Wicklow County Development Plan 2021-2027 which is currently on public display.
- Our client Charles O'Reilly Hyland, owns the subject site to the east of Coolbeg townland, which has been a long established commercial hub on unzoned land.
- The objective of rural land zoning is to; *preserve the amenity, character and scenic value of rural areas, and to generally require employment-generating development to locate on zoned / designated land within existing settlements. Notwithstanding this, it is the objective of the Council to support the diversification of the rural economy through the development of appropriate rural based enterprises, which are not detrimental to the character, amenity, scenic value, heritage value and environmental quality of a rural area.*
- Our clients proposes to rezone approximately 4.8 hectares of their land, located nearest the townland of Coolbeg situated on the M11 at the R751/M11 junction; approximately; 7km from Wicklow Town. The proposal involves the re-zoning of the lands to a Motorway Service Area (MSA).

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1.0 Introduction

In accordance with Section 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended), Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, on behalf of our clients, Charles O'Reilly Hyland, wish to make this submission on the Draft Wicklow County Development Plan 2021-2027 to Wicklow County Council.

This written submission is made in response to an invitation for comments from interested parties by Wicklow County Council. This submission is being made within the specified timeframe for submissions i.e. 30th August 2021, as set out on the Draft Development Plan's webpage.

2.0 Planning Legislation

Section 9 of the Planning and Development Act, 2000 (as amended) provides that, subject to the requirements set out in Section 9, 10, 11 and 12 of the Act, that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act, 2000 (as amended) and must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the Draft Development Plan is contained within Section 11 of the Planning and Development Act, 2000 (as amended) and the consultation process of the Draft Development Plan is contained within section 12 of the Planning and Development Act, 2000 (as amended), which states:

"12 - (1) Where the Draft Development Plan has been prepared in accordance with section 11, the planning authority shall within 2 weeks of the period referred to in section 11(5)(c)—

- (a) send notice and a copy of the Draft Development Plan to the Minister, the Board, the relevant regional authority, the prescribed authorities, any town commissioners in the area and any city or county development boards in the area, and*
- (b) publish notice of the preparation of the draft in one or more newspapers circulating in its area.*

(2) A notice under subsection (1) shall state that—

- (a) a copy of the draft may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly), and*
- (b) written submissions or observations with respect to the draft made to the planning authority within the stated period will be taken into consideration before the making of the plan".*

This submission to the draft of the Development Plan is being made in accordance with Section 12 (2) (b) of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified timeframe (4th June – 30th August 2021) as set out on the webpage of the Wicklow County Development Plan 2021-2027.

3.0 Site Location and Description

The subject lands, which extend to approximately 4.8 hectares (10 acres), are located approximately 6km southwest of Wicklow Town Centre and east of the M11 at the R751/M11 junction. The lands include the Beehive bar and restaurant, a guesthouse, a HGV parking facility and a park and ride facility. Historically the premises included a convenience store to the front of the original building. Part of the site comprises a local on-site wastewater treatment plant for The Beehive and as such is commercial in nature. Therefore the entire site is commercial and not rural or agricultural. Access to the site is via the R751. It serves M11 exit 18.

This location caters for strategic long distance inter-regional traffic as it serves routes Dublin-Rosslare, Dublin-Wexford and Dublin-Waterford. Additionally, the site serves inter-urban traffic with links between Gorey, Arklow and Dublin. The South-East of Ireland is a significant driver in Ireland's tourism, services facilities at the proposed site would support networks between popular seaside destinations Tramore, Dunmore East, Brittas Bay and Dublin.

The planning history of the site demonstrates its long-established commercial use with a restaurant and bar premises, guest house, HGV parking and a park and ride facility. Therefore, noting its history and its proximity to the junction with the M11, it is important that a viable and sensible zoning or local objective is sought for the lands that will not materially conflict with national planning guidelines, particularly that of the 'Spatial Planning and National Roads Guidelines for Planning Authorities'.



Fig .1 – Site location

4.0 Planning History

Downey Planning have carried out a detailed examination of the planning history pertaining to the subject lands. With only one property on the lands, there is limited history in terms of past planning applications, which we have summarised below:

Reg. Ref. 1655; A.B.P Ref. PL27.248302 – On 22nd September 2017, An Bord Pleanala overturned Wicklow County Councils decision to permit re-development of existing commercial site to provide off-line service area. This application was refused for the following reasons;

- The proposed development is in an unzoned rural area adjoining the motorway road network close to a major junction (function 18) on the M11, which has not been identified in the National Roads Authority Service area policy issued in August 2014 as a suitable location for an off-line motorway service area.
- Having regard to the location of an off-line motorway service area of the scale proposed in conjunction with established commercial development on site, its accessibility in the local area, in particular Wicklow town, and having regard to the level of motorway service facilities established along the proportion of the M11, it is considered that the proposed development would have strong potential to become a significant destination in its own right, and thereby directly divert trade away from the town due to the scale and level of services proposed on the site and the ease of accessibility of the area by car.

Reg. Ref. 97/6337 – Planning permission granted for retention of alterations to already approved development carried out under Planning Ref. 90/6281

Reg. Ref. 90/6281 – Planning permission granted for the demolition of outbuildings, alterations and additions to existing public house including restaurant and treatment plant and other external works

The above planning history demonstrates that there is an existing commercial business at the subject site, known as the Beehive Bar and Restaurant and as such it is not a greenfield agricultural site. The wider site has therefore historically been in commercial use.

5.0 Planning Context

5.1 Spatial Planning and National Roads Guidelines (2012)

These guidelines have been prepared in the context of the delivery of the National Spatial Strategy and actions identified in Smarter Travel, A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020.

The guidelines set out planning policy considerations relating to development affecting national roads (including motorways, national primary and national secondary roads) outside the 50/60 kmh speed limit zones for cities, towns and villages.

These guidelines have been developed by following a number of key principles and aim to facilitate a well-informed, integrated and consistent approach that affords maximum support for the goal of achieving and maintaining a safe and efficient network of national roads in the broader context of sustainable development strategies, thereby facilitating continued economic growth and development throughout the country.

Chapter 2 of the national guidelines sets out how the Development Plan can enable access to motorways and identify suitable sites for service stations. The subject site would comply with many of the criteria set out in this chapter in terms of being suitable for a service station. As the retail element would be ancillary, it would not be considered a retail destination. The primary function would be motorway service.

Planning authorities may consider policies for the provision of off-line motorway service facilities in reference to the requirements and advice included in the most up-to-date NRA guidelines. This includes guidance on the layout and location of the NRA's service areas; also similar type existing or planned privately promoted service facilities within existing towns/settlements and located in the general environs of the relevant road corridor.

1. Avoid proliferation

An off-line service area at this location avoids proliferation of service stations. This station better serves south bound traffic. The nearest stations better serve northbound traffic. Currently, along the M11 there is approximately 12km between the site and nearest station, which is itself offline. There is no adequate offering south of Wicklow town. This is outlined further in this document.

2. Service stations should avoid attraction of short local trips, as this threatens the viability of businesses in cities, towns and village centres.

This location is at a strategic road corridor serving long distance inter-regional and inter-urban traffic, which does not take from the viability of business of village, town and city centres. While the land is unzoned, the current use of the site and surround services are un-conforming to the zoning. This is a junction/interchange area with services pertaining to HGV and national route road users. For this reason, an off-line service station on this site will not take from urban or village centres.

5.2 Wicklow County Development Plan 2016-2022

Chapter 9 of the Development Plan outlines the strategic objectives for roads in the county and in particular the N11/M11.

TR18 To support major road improvements by reserving the corridors, as and when these are identified, of any such proposed routes free of development, which would interfere with the provision of such proposals.

TR19 To co-operate with TII in the upgrade of existing interchanges on the National Routes and where appropriate and necessary, to restrict development immediately adjacent to interchanges to provide for the future enlargement of interchanges.

TR20 To co-operate with TII and other Local Authorities to improve existing or provide new links from Wicklow (in particular, the growth centres and ports of Wicklow) to other counties in the region, including the Leinster Outer Orbital Route as proposed in the Regional Planning Guidelines.

TR21 To safeguard the capacity and safety of the National Road network by restricting further access onto National Primary and National Secondary roads in line with the provisions of the 'Spatial Planning and National Roads' Guidelines' (DoECLG 2012). In particular, a new means of access onto a national road shall adhere to the following:

(a) Lands adjoining National Roads to which speed limits greater than 60kmh apply: The creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmh apply shall generally be avoided. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.

(b) Transitional Zones: These are areas where sections of national roads form the approaches to or exit from urban centres that are subject to a speed limit of 60kmh before a lower 50kmh limit is encountered. Direct access onto such road may be allowed in limited circumstances, in order to facilitate orderly urban development. Any such proposal must, however, be subject to a road safety audit carried out in accordance with the TII's requirements and a proliferation of such entrances, which would lead to a diminution in the role of such zones, shall be avoided.

(c) Lands adjoining National Roads within 50kmh speed limits: Access to national roads will be considered by the Planning Authority in accordance with normal road safety, traffic management and urban design criteria for built up areas.

TR22 To ensure that all new developments in proximity to National Routes provide suitable protection against traffic noise in compliance with S.I No. 140 of 2006 Environmental Noise Regulations and any subsequent amendments to these regulations.

TR23 To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national

road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.

6.0 Justification and Grounds for Re-Zoning

This re-zoning submission seeks a change to the zoning objective of the subject site under the Draft Wicklow County Development Plan 2021-2027 from an unzoned rural land to a motorway-related serviced zone or 'Motorway Service Area'. In doing so it seeks to support the new draft development plans approach to regional and economic development by developing existing serviced land and supporting inter-regional and urban traffic. The site is a long established commercial hub with multiple commercial operations. Chapter 2 of the national road guidelines sets out how the Development Plan can enable access to motorways and identify suitable sites for service stations. The subject site would comply with many of the criteria set out in this chapter in terms of being suitable for a service station. As the retail element would be ancillary, it would not be considered a retail destination. The primary function would be motorway service.

The M11 and junction 18 are significant for transport links in Wicklow and more broadly the EMRA and SRA. This re-zoning submission seeks to support county and regional development in the most viable way.

Crucially, a proposed development on this site can provide a safe and appropriately designed access to the M11 where currently there is difficulty in terms of local access. This was a factor in the initial granting of planning permission by Wicklow County Council for an offline service area on the site, whereby the planner's report stated that the entrance and exit layout, which included a separate exit for HGVs and a specific T-junction, provided a high quality integration with the M11 and would be a cohesive and safer road layout than the existing junction. This comment was further supported in the Inspector's report (A.B.P Ref. PL27.248302).

Current Land Use Zoning (Wicklow County Development Plan 2016-2022)

Despite the site holding a commercial business for generations, the site is not currently zoned for development. It is situated within unzoned land, which hinders its sustainable intensification. In the Wicklow County Development Plan 2017 – 2021 there is a strategic objective for the economic development in rural areas. This is identified in 'Rural Clusters & Rural Areas' i.e. any location outside the development boundary of any settlement in Level 1-8)

- *To preserve the amenity, character and scenic value of rural areas, and to generally require employment-generating development to locate on zoned / designated land within existing settlements. Notwithstanding this, it is the objective of the Council to support the diversification of the rural economy through the development of appropriate rural based*

enterprises, which are not detrimental to the character, amenity, scenic value, heritage value and environmental quality of a rural area.

- **existing commercial development*nonconforming uses*
- *Strategic location, access, central location, nearest service station*
- *Local objective to offline stations*
- *Aimed at motor way users/ not town centre users*

Rural Employment Objectives (Wicklow County Development Plan 2016-2022)

There are a number of objectives in the current and draft plan that would support this proposal:

RUR1; *To permit the development of employment generating developments in rural areas, where it is proven that the proposed development requires to be located in a rural area (e.g. dependent on an existing local resource) and will have a positive impact on the location.*

RUR2; *To permit the development of small-scale commercial / industrial developments in rural areas that are not dependent on an existing local resource, subject to compliance with all of the following criteria*

1. *The proposed development shall be a small-scale industrial / commercial scheme or service and the number employed shall be appropriate in scale to the location and its characteristics, including proximity to the workforce and customers.*
2. *The proposed development shall be located on the site of a redundant farm building / yard or similar agricultural brownfield site.*
3. *The nature and scale of the proposed development and the proposed process or activity to be carried out, shall be appropriate to and compatible with, the character of the rural environment of the site at which the development is proposed, and shall not be detrimental to the rural amenity of the surrounding area. In the assessment of planning applications, cognisance shall be taken of the location of the site vis-à-vis the proximity of the site to the national and regional road network.*

Draft Land Use Zoning (Wicklow County Development Plan 2021-2027):

As before, the subject site is not zoned for development; it is unzoned rural land. Similar to the previous plan, there are strategic objectives for the economic development of rural areas;

- *In accordance with NPO15 include policies to support the appropriate and sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.*

Proposed Re-Zoning

Proposed Zoning for the site: Motorway Service Area (MSA); To provide for the servicing of vehicular traffic along the M11 to include (but not limited to) petrol/diesel filling station, electrical vehicle (EV)

charging points, park and ride facilities and small retail offering a food and hot food/coffee takeaway service. With a fast-growing consumer trend towards electric vehicles and park and ride transport, there is a unique opportunity to offer a new form of motorway service area for the 21st century.

The focus on park and ride and electric vehicle charging facilities meets the draft policies of Chapter 12 Sustainable Transport in the Draft Development Plan 2021-2027. The draft states that the Development Plan will 'support the transition from existing fossil fuel vehicles to clean renewable vehicles, support and facilitate the transition to electric vehicle (EV) use, including measures for more recharging facilities and prioritise EV parking in central locations.' It also states that it will support development of 'Park and Ride' facilities, particularly for access to public transport but also to encourage carpooling and discourage single occupancy vehicles.

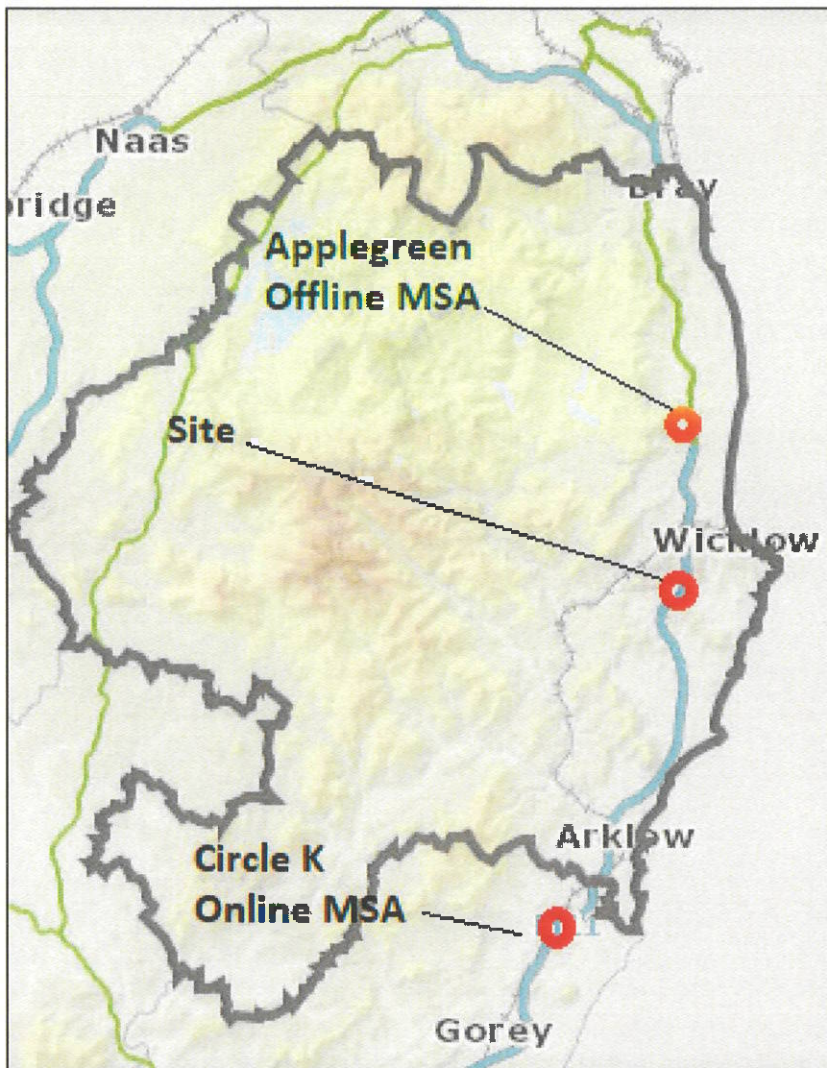


Fig. 2 – M11 route showing the subject site and nearest Motorway Service Areas (MSA) on the M11

Proliferation

As mentioned, there would be no proliferation or concentration of motorway service stations, as many existing service stations in the area are on feeder routes or in urban settlements away from the M11. Between Glen of the Downs and Wicklow town there is one offline Applegreen service station on the M11 (one services both northbound and southbound) – being 11.7km north of the site. There is no motorway service station south of Wicklow town within County Wicklow. The next nearest Applegreen stations for example are inside Arklow town, which is not convenient, or just outside Gorey, Co. Wexford. There is a Circle K (Ashford village) is 7.8km to the north along the M11 but does not adequately service M11 traffic. Approximately 28km to the south in Co. Wexford, there is an online Circle K service station. There is a lack of motorway service areas on this stretch of the M11 and therefore it cannot be said that there is a proliferation of motorway service stations directly accessible from the M11, which the subject site can provide. A proposed service area at this location would be the only such MSA to the east of the M11. It should also be noted that on the R751 route and south of Wicklow town, there are also no service stations within County Wicklow.

In terms of retail/commercial impact on Wicklow Town/Rathnew, MSAs provide modest and specific retail offerings that clearly cater for passing motorists who would not want to divert from the motorway. Wicklow town is at a distance of 4.5km from the subject site and this is a sufficient distance to prevent any negative impact. This is the normal distance between two villages for example. It would not provide any refuelling options for motorists as it is simply too far from the M11. This is the normal distance between 2 villages for example. Also, there would not be any specific traffic emanating from Wicklow town to the proposed service station unless their trajectory was to the M11 itself. Therefore it cannot be said to be a 'destination'.

Sequential Approach and Retail Impact Assessment on out-of-centre retail development

According to the Retail Planning Guidelines (2012), applications for retail developments must comply with the criteria on location, size and accessibility set out in the Retail Guidelines and relevant Development Plan in order to ensure the most suitable site for the type of retailing is proposed. However, where the location of a proposed retail development submitted on a planning application is not consistent with the policies and objectives of the Development Plan and/or relevant retail strategy for the city or town centre, then that development proposal, must be subject to the **Sequential Approach** and its policy principles and order of priority set out below and any departure from these principles must be justified.

Where retail development on an out-of-centre site is being proposed, only in exceptional circumstances where the applicant can demonstrate and the planning authority is satisfied that there are no sites or potential sites either within the centre of a city, town or designated district centre or on the edge of the city/town/district centre that are **(a) suitable (b) available and (c) viable**, can that out-of-centre site be considered.

- a) *Suitability: Matters to be considered include whether or not the development is consistent with development plan objectives, in particular zoning objectives, current land use activity in the vicinity of the site, size, capacity to accommodate development, traffic and transportation issues; and/or;*

With regard to the proposed potential Beehive MSA, the current land use on the site does not conform to un-zoned rural land. It is a built-up commercial site with a long historic establishment. Due to the current use and strategic location for long distance interregional traffic, an off-line service station and electric charging points are consistent with current land use activities.

- b) *Availability: this criterion relates to site ownership, ease of assembly and timing. Sites must be genuinely available for development at the time that site acquisition/ assembly begins or within a reasonable time-frame;*

The Beehive lands **are available for development** – the site has an existing entrance, car park and inn & restaurant with associated facilities.

- c) *Viability: the financial viability of a development is also a key consideration. The cost of site acquisition in the town centre may make a proposal unviable and force investors to look elsewhere in the area. Excessive development costs relative to values are also a consideration. For example, the requirement to deal with remediation for a brownfield site may have the potential to make a proposal unviable.*

To facilitate out-of-centre retail the planning authority must determine that no city/town centre or edge-of-centre sites are suitable, viable and available and which can provide the form and scale of development required under the development plan or relevant retail strategies, the planning authority must not approve such development unless it is satisfied that there will be no negative impact on the vitality and viability of the retail core.

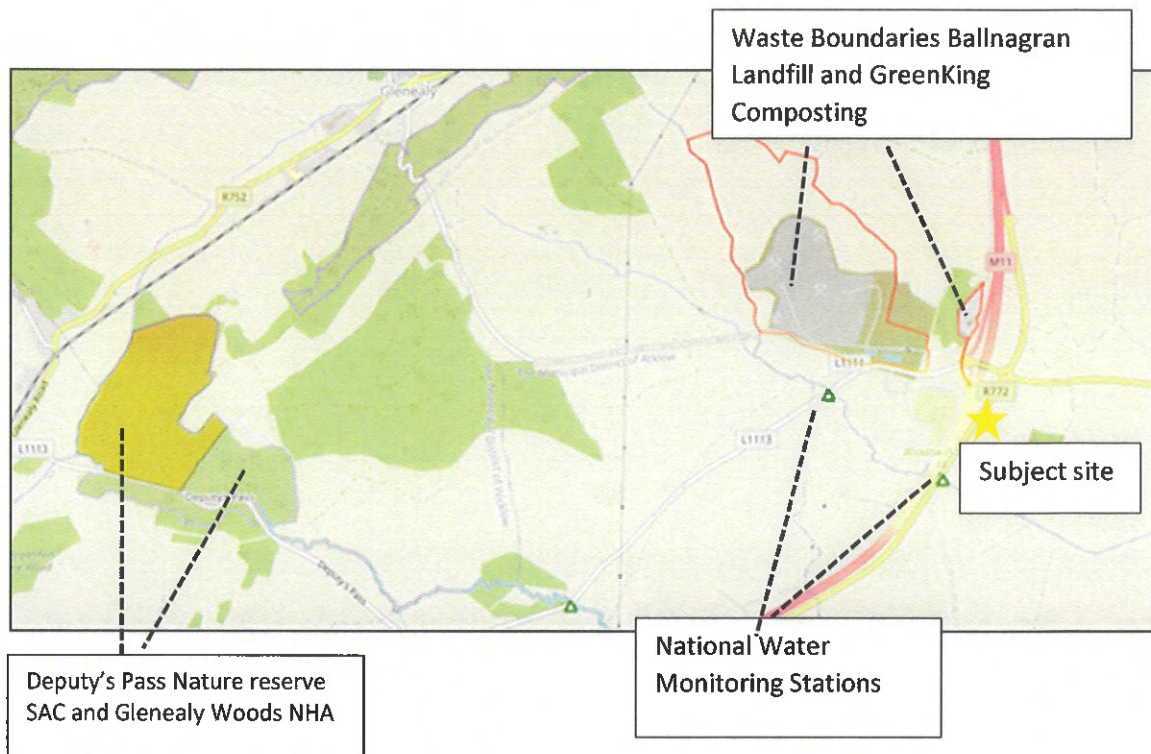
In this instance a Retail Impact Assessment is required to determine the context of relevant Development Plan policies and objectives for retailing or may be raised by the planning authority in pre-application stages or during the planning application. Using the Retail Impact Assessment criteria set out in the Retail Planning Guidelines (2012), as a guide, it is clear that the proposed MSA would:

- not materially diminish the prospect of attracting private sector investment into one or more such centres;
- would have the potential to increase employment opportunities and promote economic regeneration;
- have the potential to increase competition within the area and thereby attract further consumers to the area;
- respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support;
- not cause an adverse impact on one or more city/town centres, either singly or cumulatively with recent developments or other outstanding planning permissions (which have a realistic prospect of implementation) sufficient to undermine the quality of the centre or its wider function in the promotion and encouragement of the arts, culture, leisure, public realm function of the town centre critical to the economic and social life of the community;
- not cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;
- ensure a high standard of access both by public transport, foot and private car so that the proposal is easily accessible by all sections of society;
- and/or link effectively with an existing city/town centre so that there is likely to be commercial synergy.

Environmental Issues

The site is not located adjacent or within an SAC, SAP nor a Natural Heritage Area. There are areas of ecological and environmental interest within the locality.

Three Mile Water river is located at the south of the site, this river is not considered a “River Waterbody Risk”. This river has a “good” ecological status. (EPA 2021) Additionally, are two National Water Monitoring Stations along the Three Mile Water river to the south-west of the site. The referenced location is 4.8km away from Deputy’s Pass Nature reserve SAC and Glenealy Woods NHA. The Ballnagran Landfill is located approximately 1.4km from site. GreenKing Composting Ltd located roughly 425m away from the site. The site has never been flooded.



7.0 Planning Precedents

There are a number of relevant precedents we would like to draw attention to in relation to the suitable siting of offline service areas on unzoned lands. Many of these planning permissions were granted in advance of the publication of national road guidelines. However, the principle of development is very relevant as many of these sites were similarly unzoned and outside towns and villages.

Barack Obama Plaza, Moneygall, Co. Tipperary

Planning Ref. 07/511750 – Planning permission granted by Tipperary County Council in 2008 to Liam Carroll for a ‘motor service area and rest area which will consist of on-site fuel retail facilities including canopy, truck & car wash, truck/coach parking, car parking, children's play area, signage, service station building including seated food accommodation, deli area, ATM facility, convenience shop, commercial drivers' lounge, toilets, showers and changing areas, staff changing area, store, office,

landscape maintenance shed, private well, geo-thermal heating pump store, 3 number roundabouts providing access on/off the proposed Castletown to Nenagh high quality dual carriageway' at Drumbaun, Moneygall.

The site was unzoned and categorised as 'Open Countryside' in the Development Plan at the time. The Council considered that it was possibly premature given the motorway had not yet been constructed. However it was also (a) within a 60km/hr zoning restriction and (b) with no other service station on this road thereby complying with Policy ECON 28. The Council deemed this a suitable location for a new motorway service area. The economic benefits to the area were given significant weight in the planner's report. Further information was requested with regard to design specification and demonstrating that the viability of Moneygall village (500m distance) would not be impacted. This was deemed acceptable and planning permission was granted.

McDonagh Plaza, Carrowkeel, Co. Galway

Planning Ref. 07/4650 - Planning permission was granted by Galway County Council in 2008 to Paddy Hynes and Michael Prenty for 'the construction of a new service station on the proposed N6 Galway to East Ballinasloe road at the proposed Carrowkeel Junction. The service station includes petrol/diesel filling station with canopy, shop, restaurant, fast food take away, underground storage tanks (for fuel) picnic area, parking for cars, trucks, heavy goods vehicles, buses and all associated site development works and services. The proposal also includes wastewater treatment system and percolation area on adjacent site and all associated site development works and services. (Gross floor area 886sqm) at Carrowkeel, Co. Galway.'

In terms of the Galway County Development Plan, the site was zoned 'Rural Area' and was not serviced. However, it was located within 500m of the proposed M6 motorway and located within the Galway Transportation and Planning Study Area (GTPSA). As the proposal related to the servicing of infrastructural development, the use was open to consideration in the zoning matrix of the Galway County Development Plan. The NRA made a submission stating they 'neither support nor oppose the proposal'. This neutral stance differed from their objection to a previous planning application for the same site (ref. 07/1928). The reason for refusal on that occasion related to road design and safety. The planners report for this permission states that this reason has now been addressed. A request for further information was made by the Council relating to drainage and the environment. The response was deemed satisfactory and planning permission was granted.

The distance from the nearest service station and urban settlement (Loughrea) is approximately 11km, which underlines the need for continued service areas along major road networks.

8.0 Conclusion

This written submission is made by Downey Planning, on behalf of our client Charles O'Reilly Hyland, and is submitted to Wicklow County Council in the context of the Draft Wicklow County Development Plan 2021-2027 which is currently on public display. Our client owns the subject site to the east of Coolbeg townland.

The site has a long established commercial use, but the lands remain unzoned in the Draft Development Plan. Our client proposes to rezone approximately 4.8 hectares of their land, located nearest the townland of Coolbeg situated on the M11 at the R751/M11 junction; approximately 7km from Wicklow Town. The proposal involves the re-zoning of the lands to a Motorway Service Area (MSA). There is ample evidence of the suitability of this site for a MSA that would be in compliance with Transport Infrastructure Ireland objectives and the Spatial Planning and National Road guidelines (2012). Service stations at various locations in the country have been constructed on previously unzoned lands and the same planning principles apply to the subject site. Our client also proposes the insertion of a policy that specifies this site as a suitable location for an offline Motorway Service Area, particularly one that can facilitate park and ride, HGV parking and electric vehicle charging in accordance with emerging sustainable transport policy objectives nationally and locally.

The re-zoning opportunity seeks to meet the objectives of Chapter 12 Sustainable Transport in the Draft Development Plan 2021-2027, which specifically identifies park and ride and electric vehicle charging facilities. It is proposed to incorporate these on the subject site for any potential re-zoning or site-specific policy objective. As demonstrated, there would be no proliferation or over concentration of such services. There is sufficient distance between the subject commercial site and existing filling stations on the M11 route.