Forward Planning Section, Planning and Environment, Wicklow County Council, County Buildings, Wicklow Town



Harcourt Lane, Dublin 2

Dún Scéine, Baile Átha Cliath 2

tel: 01 879 8300 fax: 01 879 8333

email: info@nationaltransport.ie web: www.nationaltransport.ie

25th May 2022

RE: Proposed Amendments to the Draft County Development Plan

Dear Sir / Madam,

The National Transport Authority (the "NTA") have reviewed the Proposed Amendments to the Draft Wicklow County Development Plan and make the following observations and recommendations, based on the Transport Strategy for the Greater Dublin Area 2016-2035 (the "Transport Strategy") and taking into account the 2022-2042 Draft Transport Strategy.

1. General Overview

The NTA welcome the amendments to the draft County Development Plan which take into account the recommendations made at the previous stage. These recommendations were based on ensuring that the Development Plan is consistent with the Transport Strategy, as is required under Section 9 (6A) of the Planning and Development Act (as amended), as well as ensuring that it frames the future growth of the County in a manner which facilitates and promotes sustainable transport; reduces car dependency; and leads to reduced emissions from transport.

In advance of making any further recommendations, the NTA notes the following:

- The retention of some employment zonings based on previous decisions;
- The retention of an objective related to a Luas to Blessington; and
- The retention of objectives for significant investment in road infrastructure schemes.

The NTA is of the view that the current draft Development Plan contains a degree of risk in terms of fostering sustainable development by failing to adequately prioritise development in locations that can be served by public transport, walking and cycling, and by placing an overemphasis on the provision of additional road capacity.

2. Luas to Blessington

In submitting on the Draft Development Plan, the NTA stated the following in relation to the above:

"The NTA does not foresee the extension of Luas to Blessington occurring for a range of transport planning and feasibility reasons, including:

- Extremely low demand for travel from Blessington which can be comfortably accommodated by an improved bus service;

- Absence of any significant centres of population or other activity between the existing Red Line termini and Blessington;
- The requirement for the N81 to carry general traffic, including a significant proportion of HGVs; and
- The cost of such a scheme."

The NTA recommended that this scheme should be deleted but notes that reference to it was retained in the Development Plan.

NTA Recommendation

The NTA reiterates its recommendation that reference to Luas being extended to Blessington is removed from the Development Plan as its inclusion would render the Development Plan inconsistent with the Transport Strategy.

3. Expansion of Urban Footprints of Settlements

The NTA notes a number of amendments in Newtownmountkennedy, Rathdrum and Ashford which seek to expand the urban footprint by zoning additional lands for a range of uses including a nursing home, new residential, and employment. It is not clear how such amendments could be considered consistent with the overarching requirement to promote compact growth.

NTA Recommendation

The NTA recommends that the local authority reconsiders the extent and location of lands proposed for rezoning in the above settlements, with a view to accommodating growth in lands already zoned and / or within the existing urban footprint of these settlements.

4. Amendment V1-33 – Motorway Service Station at Beehive

The NTA notes the inclusion of the above amendment and the planning history associated with this site and is concerned that any development of this nature at this location would comprise an extension of an existing commercial activity at the motorway interchange rather than fulfilling any identified strategic need for an off-line motorway service station. As such, and in particular in the absence of a clear plan-led rationale, this zoning as presented would not be consistent with the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and would not align with the principles of the Transport Strategy.

NTA Recommendation

The NTA recommends that the local authority reconsiders this zoning and takes full account of the views of TII in this regard.

5. Amendment V1-51 - Tourism Zoning at Jack whites

The NTA notes the inclusion of the above amendment and, in a similar manner to Amendment V1-33 above, is concerned that any development of this nature at this location would comprise significant commercial activity at the motorway interchange. The lack of clarity provided in the amendment as to the scale and intensity of proposed uses at this site adds to this concern. As such, and in particular in the absence of a clear plan-led rationale, this zoning as presented would not be consistent with the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and would not align with the principles of the Transport Strategy.

NTA Recommendation

The NTA recommends that the local authority reconsiders this zoning and takes full account of the views of TII in this regard.

6. Amendment V1 – 56 – West Wicklow

The NTA notes and welcomes the commitment of the local authority in relation to improving public transport in West Wicklow, including the provision of bus priority on the N81. Such measures will require to be agreed with the NTA and TII as part of an agreed package of sustainable transport measures for this corridor.

In relation to Park and Ride, the local authority should be aware that a Park and Ride Office has been established within the NTA and that a Park and Ride Strategy formed part of the Draft Transport Strategy published in 2021. While the traffic analysis undertaken as part of that strategy indicated that future demand from the West Wicklow corridor would not necessitate additional strategic Park and Ride facilities, the NTA would welcome the exploration of local facilities which meet the objectives of the NTA to intercept car traffic outside the Metropolitan Area of Dublin and transfer city-bound motorists to public transport services.

NTA Recommendation

The NTA recommends that Amendment V1-56 is retained in the finalisation of the Development Plan.

I trust that the views of the NTA are taken into account in the finalisation of the Wicklow County Development Plan.

Yours sincerely,

Michael MacAree

Head of Strategic Planning

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