

County Development Plan Review
Planning Department
Wicklow County Council
County Buildings
Station Road
Wicklow

Submitted via on-line submission portal; consult.wicklow.ie

Dáta | Date
19 May, 2022

Ár dTag | Our Ref.
TII22-118395

Re. Proposed Material Alterations to the Draft Wicklow County Development Plan, 2022 - 2028

Dear Sir/Madam,

TII acknowledges receipt of referral of Proposed Material Alterations to the Draft Wicklow County Development Plan, 2022 - 2028. The Authority acknowledges and welcomes the Proposed Material Alterations arising from consideration of the Authority's initial submission on the Draft Plan. In relation to other Proposed Material Alterations on display, TII outlines the following observations;

Proposed Material Amendment ref. V1 – 33

In relation to Proposed Material Amendment ref. V1 – 33 and a new Objective to provide for a Motorway Service Area at 'The Beehive', Coolbeg Cross (M11 Junction 18), TII is aware of the planning history of the subject site (Wicklow County Council planning file ref. 16/55) and it is unclear that the proposed Objective addresses the reasons for refusal outlined by An Bord Pleanála in their decision on the subject application.

In addition, the proposed Objective is included on lands adjoining M11 Junction 18; Section 2.7 of the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) requires planning authorities to exercise particular care in the assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact the national road.

TII is not aware of any plan-led evidence base prepared to demonstrate that the proposed Objective adheres to the provisions of Section 2.7 of the Spatial Planning and National Roads Guidelines (DoECLG, 2012). Given the nature of development proposed, Section 2.8 'Service Areas' of the Guidelines also applies.

TII considers that there is an absence of evidence base to address the requirements of both Section 2.7 and Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and to demonstrate how the reasons for refusal included by An Bord Pleanála in relation to Wicklow County Council planning application ref. 16/55 are addressed.

Accordingly, TII considers the proposal to include a new Objective 'to provide a Motorway Service Area at 'the Beehive', Coolbeg Cross', as proposed in this subject Material Amendment conflicts with the provisions of official policy included in the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and TII recommends against its inclusion in the adopted Development Plan.

Proposed Material Amendment ref. V1 – 51

Proposed Material Amendment ref. V1 – 51 proposes the introduction of a new Tourism Objective ‘to provide for tourism development at Jack Whites’.

Having regard to the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012), TII is concerned with the proposed new Objective relating to lands in such close proximity to a junction of the M11.

The Authority considers that it is premature to include such a proposed Objective in the Development Plan in the absence of the required plan-led evidence-base in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012) and having regard to the potential impact the development of such lands could have on the safety and efficiency of the strategic national road network in the area.

TII is aware that similar proposals were addressed in the Chief Executives Report on Submissions received in relation to the Draft County Development Plan, 2016 – 2022, and the Chief Executive recommendation was that such a proposal should not be included in the Development Plan in advance of the required plan-led evidence based data required in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines (2012) and having regard to the potential impact the development of such lands could have on the safety and efficiency of the strategic national road network in the area.

TII supports the recommendation of the Chief Executive outlined in the Chief Executives Report of May, 2016. TII is also unaware of the development of any plan-led evidence base in the interim. In addition, the proposal does not appear to support compact growth and the subject site does not appear well served by active travel and public transport, and as such, appears to be inconsistent with the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035.

Accordingly, TII considers that the proposal to include a new Objective ‘to provide for tourism development at Jack Whites’ as proposed in this subject Material Amendment conflicts with the provisions of official policy included in the Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012) and TII recommends against its inclusion in the adopted Development Plan.

Proposed Material Amendment ref. V1 – 56

Proposed Material Amendment ref. V1 – 56 includes the objective to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus services / bus priority on the N81, bus linkages to rail stations and the development of park and ride facilities at strategic locations.

TII advises that any proposals for improved bus services / bus priority on the N81 should be developed complementary to safeguarding the strategic function of the national road network. In addition, the Council will be aware that any works to national roads are required to adhere to TII Publications (Standards). Any proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.

TII also notes the proposal to develop park and ride facilities at strategic locations and considers that such proposals should be advanced in consultation with the NTA and in accordance with the Transport Strategy for the Greater Dublin Area. TII would welcome consultation on such proposals where there may be implications for the strategic national road network.

Proposed Material Amendment ref. V1 – 61

TII notes Proposed Material Amendment ref. V1 – 61 concerning CPO 12.36 and Objectives related to the M/M11. In relation to the proposed objectives related to the M/N11, TII confirms that the observations made in TII’s initial submission on the Draft Plan, remains TII’s position.

Other Development Plan Policies/Objectives

In addition to the above Proposed Material Amendments, there are other provisions included in the Draft Plan that TII had identified as being at variance with the provisions of the Section 28 Ministerial Guidelines ‘Spatial Planning

and National Roads Guidelines for Planning Authorities' (DoECLG, 2012), in particular, Objective CPO 9.15 which provides for employment development at specific locations identified at national road junctions.

In relation to the designation of such sites at Kilpedder Interchange, at Mountkennedy Demesne, Kilpedder and at Inchanappa South and Ballyhenry, Ashford, TII advises, notwithstanding the Chief Executives assessment and response to TII's submission, that the observations made in TII's initial submission on the Draft Plan remain the position of the Authority. TII had recommended that an exercise is undertaken to evaluate and amend Employment Development Zonings Map ref. 09.01 (Mountkennedy Demesne, Kilpedder) Map ref. 09.02 (Kilpedder Interchange); Map Ref. 09.03 (Ashford) to demonstrate that the zoning proposals are consistent with the requirements of the DoECLG Guidelines and the N11/M11 Junction 4 to Junction 14 Improvement Scheme currently been progressed prior to adoption into the new Development Plan.

The Council will be aware of the critical need to manage national road assets and associated junction in accordance with official Government policy as outlined not only in the DoECLG Spatial Planning and National Road Guidelines for Planning Authorities, but also the TEN – T Regulation (EU) No 1315/2013, the National Planning Framework, the National Development Plan and the National Investment Framework for Transport in Ireland.

Government has set out the key sectoral priority, included in the National Development Plan, 2021 – 2030, of maintaining Irelands existing national road network to a robust and safe standard for users.

This priority is reflected in the National Investment Framework for Transport in Ireland (NIFTI) which outlines the investment hierarchy of maintaining and optimising transport assets before investment in improvements or new infrastructure is considered. NIFTI also acknowledges that preserving key strategic links will help deliver the necessary capacity on surface access routes to ports and airports and promote balanced regional development.

Further, the Eastern and Midland Regional Authority Regional Spatial and Economic Strategy, 2019 – 2031, includes the objective of maintaining and protecting the strategic transport function of national roads and associated junctions as a guiding principle for the integration of land use and transport planning.

The subject sites do not appear to support compact growth and do not appear well served by active travel and public transport, as such, they also appear to be inconsistent with the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035.

Accordingly, TII remains of the opinion that the proposals included in Objective CPO 9.15 providing for employment development at locations at national road junctions conflict with the provisions of official policy, as outlined above, including the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012) and the NTA Transport Strategy for the Greater Dublin area, 2016 – 2035.

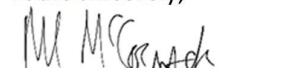
Conclusion

TII acknowledges and welcomes the Proposed Amendments included in the Proposed Material Alterations to the Draft Wicklow County Development Plan, 2022 - 2028, following the Councils consideration of TII's initial submission on the Draft Plan.

However, there remain a number of Policy Objectives and Development Objectives included in the Draft Plan and the current Proposed Material Alterations that TII consider require review to ensure proposals reflect the provisions of the Section 28 Ministerial Guidance 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012).

It is respectfully requested that the above observations are taken into consideration prior to the adoption of the Wicklow County Development Plan, 2022 – 2028.

Yours sincerely,



Michael McCormack
Senior Land Use Planner