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Planning and Strategic Infrastructure Department
Fingal County Council
County Hall Mian Street
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Submission by <https://consult.fingal.ie/en/browse>

Dáta | Date Ár dTag | Our Ref
16 December 2022 TII22-121082

Re: Material Alterations to the Draft Fingal County Development Plan, 2023-2029.

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of Proposed Material Alterations to the Draft Fingal County Development Plan, 2023 – 2029 and the Errata to those alterations. TII made a submission to the Draft Development Plan in May 2022 (TII ref. TII22-117431) that was recorded as ref. no. FIN-C453-585. The Authority generally welcomes the Proposed Material Alterations arising from consideration of the Authority's initial submission on the Draft Plan.

TII's observations in the Draft Plan submission, as in this one, seek to address the safety, capacity and strategic function of the national road network and Luas in accordance with TII's statutory functions and the provisions of official policy outlined in the Section 28 Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and the *EMRA Regional Spatial and Economic Strategy (RSES)* that identifies Fingal as part of the *Dublin Region* further part located within the *Metropolitan Area Strategic Plan (MASP)* area.

The maintenance and protection of the strategic function of the national road networks and associated junctions are amongst the guiding principles of the transport strategy of the RSES at *Regional Policy Objective (RPO) 8.1*. RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management.

In addition, RPO 8.3 requires future development is to be planned and designed in a manner that inter alia maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned and further protects and maintains regional accessibility. This RPO reinforces RPO 5.2 to support the delivery of key sustainable transport projects. Future Luas, Metro and BRT alignments are a matter for the NTA.

Having regard to official policy TII provides the following comment in relation to Proposed Material Alterations on display, in the order of the Draft Plan for the Council's consideration:

1. Proposed alteration: PA CH 6.12: Section 6.5.7.3 Transport Interchange, page 225

"Amend Policy CMP20 as follows:

Public Transport Interchange

Support and facilitate the provision of high-quality transport interchanges including the Blanchardstown Town Centre Bus Interchange within the transport network in order to facilitate seamless transition between different transport modes and to maximise the movement of people by sustainable modes in collaboration with the NTA and other relevant stakeholders including key active travel representative stakeholders."

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.



The Authority notes the intention to support *and facilitate the provision of high-quality transport interchanges* and reminds the County Council that as the national roads network Authority and ABTA guidance collaborator, active consultation with TII is recommended in any instance of potential interaction with the national road network to ensure that safety, efficiency, and protection of that network.

2. Proposed alterations: PA CH 6.15 and 6.16

PA CH 6.15: Section 6.5.10.2 Regional/Local Roads, page 230:

“Include in Table 6.3 as follows:

- **Naul Road Upgrade (M1 Junction 6 exit to the roundabout on the R122)”**

This alteration is indicated on Extract from Draft Development Plan Sheet 4 in Part 5 of the Fingal Development Plan 2023 – 2029 Proposed Material Alterations as **PA SH 4.2** “*Include the Naul Road Upgrade (M1 Junction 6 exit to the roundabout on the R122) as an indicative route on the relevant plan map.*”

PA CH 6.16: Section 6.5.10 Roads Network, page 231

“Include new policy after CMP32 as follows:

Policy CMPXX – Protection of TEN-T Network Support the protection and enhancement of the EU TEN-T network including the strategic function of the Dublin to Belfast Road network which provides a critical transport connection within the Dublin-Belfast Economic Corridor.”

The Authority welcomes proposed alteration PA CH 6.16 the explicit highlighting of the M1 as part of the TEN-T network that reflects EMRA RSES RPO 8.11 “*Support the improvement, and protection, of the EU TEN-T network and the strategic function of the Dublin to Belfast Road network.*”

Having regard to the above and official national roads policy, the County Council is advised by the Authority that proposed alteration PA CH 6.15 to upgrade the Naul Road (R122) is indicated to include part of the M1 Junction 6 interchange over which the R122 passes via overbridge. While the Naul Road is under the local roads authority jurisdiction, the M1 and associated structures at this junction forms part of TII Motorway Maintenance and Renewals Contract (MMaRC) Network A. Therefore, any scheme at this location needs to be undertaken in accordance with the procedures and requirements outlined in TII Publications

Consultation with TII and the Motorway Maintenance and Renewals Contract Network A Contractor will be required, via the relevant road authorities, in relation to any works proposed, including signage, that affect the motorway roads and associated junctions in terms of operational requirements such as timetabling

3. Alteration not proposed:- Draft GE-General Employment land use zoning remains at lands to the west of the R135 and the east of Cherryhound and the M2 immediately southeast of M2 Junction 2

Under National Policy Objective 74, the National Planning Framework Project (NPF) indicates the requirement to secure the alignment of the NPF with National Development Plan (NDP) through the delivery of the NPF’s National Strategic Outcomes.

The National Development Plan, 2021 - 2030, outlines the investment priority to ensure that the existing extensive transport networks, which have been enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, accessibility, and connectivity to transport users. Government also includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements, in National Strategic Outcome 2 of the National Planning Framework.

The maintenance and protection of the strategic function of the national road networks and associated junctions are also amongst the guiding principles of the transport strategy of the RSES at *Regional Policy Objective (RPO) 8.1*. RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management.

In addition, RPO 8.3 requires future development is to be planned and designed in a manner that inter alia maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned and further protects and maintains regional accessibility.

TII submission to the Draft Plan consultation recommended the removal of the proposed GE land use zoning objective at this location having regard to the national and regional policies . These policies support the requirements of the *Spatial Planning and National Roads Guidelines for Planning Authorities* and specifically sections 2.4 and 2.7 that respectively require proposals for development of lands adjacent to national roads be evidenced to demonstrate the road can continue to perform their strategic transport function into the future, and that particular care is required at locations at or close to junctions as additional traffic generated may lead to the premature and unacceptable reduction in the level of service available to road users.

TII reiterates the advice that the guidance indicates that planning authorities must make sure that development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

TII considers that the evidence-based policy prescribed approach does not appear adhered to and is thus contrary to the provisions of National and Regional policy outlined the *Spatial Planning and National Roads Guidelines for Planning Authorities* and recommendation for omission of this proposal in the Chief Executive's Report at CE OPR SH12.1 on submissions to the Draft Plan prepared in July 2022.

In this regard, TII for clarity purposes further recommends that the Employment land use zoning objective indicated southeast of Junction 2 of the M2 should be omitted until such time as the evidence base has been developed in accordance with statutory guidance outlined which is supported by national and regional policy .

CONCLUSION

As outlined above, TII acknowledges and welcomes proposed alterations to the Draft Plan that arise following the Council's consideration and assessment of TII's initial submission.

There remains specific provisions of the Draft Plan which the Authority requested review prior to adoption which are not subject to proposed alteration. The Authority's position in relation to these items remains as set out in TII's submission on the Draft Development Plan of 11 May 2022 (TII ref. TII22-117431).

TII as the national roads authority responsible for the protection and maintenance of the safety, efficiency and capacity of the national road network has serious concerns for precedent and contravention of Spatial Planning and National Road Guidelines for Planning Authorities in relation to the continuation of the Draft Plan proposal for a change in land use zoning from a rural category to a commercial development category immediately south east of junction 2 of the M2 as set out in section 4.0 above.

In relation to the Proposed Material Amendments on display, TII respectfully requests that the foregoing observations are taken into consideration by the Council prior to finalising the Development Plan. TII has identified proposed alterations *PA Ch 6.8* Local Transport Plan for the Blanchardstown Centre, and *PA CH 6.15* (mapped by *PS SH 4.2*) for the Naul Road that, in TII's opinion, require revision prior to adoption in the interests of clarity and to ensure that the Development Plan provisions advance efficient and proper planning and sustainable development where development interfaces with the national road network.

The Authority is available to meet the Executive of the Council to discuss any issues arising in the foregoing or other matters related to the Development Plan and the national road and existing light rail networks.

Yours sincerely,



Tara Spain
Head of Land Use Planning