Town Clerk  
Bray Town Council  
Civic Offices  
Main Street, Bray  
Co. Wicklow

30th July 2010

Re: Draft Bray Town Development Plan 2011-2017

Dear Sir/Madam,

The National Transport Authority (NTA) submits the following report on the Draft Bray Town Development Plan 2011-2017 (hereafter referred to as the Draft Plan). These comments focus on the following areas:

- Overall strategy
- Transport
- Development Control Standards / Guidelines (Parking)
- Public Transport Interchange Zoning

Under each policy area, observations are presented in the following order:
- Comments
- Recommendations

Section 31C(1) of the Dublin Transport Authority Act 2008 assigns the NTA\(^1\) a role in the making of a development plan. Where a notice is received by the NTA under section 12(1) it shall, as part of any written submission on the draft development plan, state whether, in its view, the draft development plan is—

- (a) consistent with its transport strategy, or
- (b) not consistent with its transport strategy and in such case what amendments to the draft plan it considers necessary to achieve such consistency.

As the NTA is currently preparing a transport strategy, this submission will be based on existing national land use and transport policy that may have a bearing on the completed transport strategy. In this, the NTA places a critical emphasis on the need for a coherent approach to be taken in the prioritisation of investment in transport infrastructure in relation to the draft RPGs transport policies and objectives, as well as other policy areas such as settlement and economic development. The comments are based on the general objectives of the NTA as set out in Section 10 of the Dublin

\(^1\) As amended by section 30(C) of the Public Transport Regulation Act 2009
Transport Authority Act 2008 as amended, where the authority is required to seek the following objectives -

(a) the development of an integrated transport system which contributes to environmental sustainability and social cohesion and promotes economic progress,
(b) the provision of a well-functioning, attractive, integrated and safe public transport system for all users,
(c) improved access to the transport system and, in particular, to public passenger transport services by persons with disabilities,
(d) increased use of the public transport system,
(e) regulated competition in the provision of licensed public bus passenger services in the public interest,
(f) the objectives set out in Section 9 of the Act of 2003 (Taxi Regulation),
(g) increased recourse to cycling and walking as means of transport, and
(h) value for money.

Overall Strategy/Core Strategy (Chapter 2)

Comment

As the administrative boundaries of the Town Council do not reflect the functional area of the town as a whole, this presents a significant challenge for the Town Development Plan’s Overall Strategy in providing for its expansion on a co-ordinated, sequential basis, administered as it is, by three local authorities under three development plans and one local area plan. In this regard, it is stated in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas that “the development plan should identify where practicable the sequential and coordinated manner in which zoned lands will be developed ... with undeveloped lands closest to the core and public transport routes being given preference” (p.8, 2.3).

Notwithstanding the prior adoption of all of the other development plans and their provision for substantial residential and employment growth in extensively zoned greenfield lands, the Overall Strategy, should nonetheless continue to place a strong emphasis on development consolidation within the town council boundary through the identification of development/redevelopment opportunities in key locations such as the station/environs and the town centre.

Furthermore, it is recommended that the Overall Strategy/Core Strategy provide greater detail on the relationship between the development objectives within the town boundary and those of the adopted Bray Environments LAP and Dun Laoghaire Rathdown County Development Plan.
Finally, it is noted that the Overall Strategy/Core Strategy does not include details on the size of the areas zoned for residential development or mixed use development. The Planning and Development (amendment) Bill 2009 states that “a core strategy shall in respect of the area in the development plan already zoned for residential use of a mixture of residential and other uses, provide details of the size of the area in hectares”.

Recommendation
Greater detail should be provided in the Overall Strategy / Core Strategy on the relationship between the Draft Town Development Plan and other adopted development plans / local area plans (Bray Environ LAP, Draft Wicklow County Development Plan, Dun Laoghaire Rathdown County Development Plan) relating to town and its environs, setting out the manner in which the town and its environs are intended to develop in a coordinated, sequential basis. The Core Strategy should include details on the size of the areas zoned for residential development or mixed use development.

Transport (Section 7.4)

General Comment
Reference is made in the Draft Plan to the DTI Strategy, DTO Strategy (A Platform for Change) and 2030 Vision (NTA) as well as a reference to the ‘NTA Strategy’. It should be noted that for the purposes of the period from 2011 (i.e. the next Bray Development Plan period), the only GDA level transport strategy of reference will be the NTA Strategy (2010-2030). This is currently at an advanced stage of preparation and is scheduled for completion within the next few months. As such, whilst the NTA would generally support the objectives presented under Section 7.4.3 of the Draft Plan, these cannot at this stage, be specifically attributed to a completed NTA Strategy.

The National Transport Authority (Section 7.4.1)

Comment
The NTA notes the description of the role of the NTA in the Greater Dublin Area. However the following sentences may include a typographical error. “The NTA has subsumed the role of the DTO, which has ceased to exist. The policies of the DTO are still however irrelevant to this plan.” It is presumed the word ‘relevant’ is meant.

It is recommended that a number of additional amendments be included to reflect the role of the NTA in future transport provision in Bray, particular regarding any transport proposals which may be pursued or facilitated by the Town Council and included in the Draft Plan, across a range of modes. A broad range of transport proposals are currently being assessed as part of the NTA Strategy’s preparation, as
specified under Section 12 of the Dublin Transport Authority Act 2008. To ensure that proposals meeting national policy objectives, each proposal is considered by the NTA:

- Against economic, environmental and social criteria (these will be specified in the NTA Strategy);
- As part of future strategy implementation plans; or
- On a case-by-case basis, as they proceed through the planning process.

Under Section 13 of the Dublin Transport Authority Act 2008, the NTA is required to make an integrated implementation plan within 9 months of the approval by the Minister of Transport of the NTA Transport Strategy. This will have regard to the Transport Strategy that will have been adopted and will reflect the need to ensure the most beneficial, effective and efficient use of exchequer resources. This will then be followed by the preparation of a Strategic Traffic Management Plan. Furthermore, under Section 65 of the Act, each local authority is required to prepare a ‘Local Traffic Plan’ for its functional area, which must be consistent with the Strategic Traffic Management Plan.

It is recommended that reference is made to the role of the NTA in relation to identifying the requirements for new road schemes or road improvements. This could be reflected in a Development Plan objective as follows:

*Review, and set out an implementation plan, for all road schemes as part of a ‘local traffic plan’ to be prepared following the publication of the NTA Transport Strategy for the GDA.*

**Recommendation**

Review the statement in Section 7.4.1 and include reference to the process outline above.

**Walking & Cycling (Section 7.4.6)**

**Comment**

It is recommended that a cycle network be included in the Draft Plan, as part of a wider area walking and cycling network for the town and its environs.

This network may include various elements including dedicated cycle facilities, and by definition should confer an advantage on cyclists and provide for an improvement in permeability. The primary purpose of this network should be to provide the cyclist with the highest Quality of Service\(^2\) feasible over the greatest length of route,

\(^2\) Quality of Service (QoS) indicators are defined in the draft national cycle guidelines (prepared by the NTA. QoS is the degree to which the main cycling requirements are met and are based on assessment of typical traffic characteristics and likely road/path type.

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while facilitating a range of trip patterns and trip purposes. The Development Plan should identify key destinations within and adjoining the town and cycle routes serving them. The main requirements for a cycle network include: road safety, coherence, directness, attractiveness and comfort.

Consistent with the National Cycle Policy Framework, it is recommended that the Development Plan include cycle mode share targets.

In the case of walking, it is recommended that the following is considered in the development of a walking policy:

- Promote walking as the primary mode for local trip making. The benefits of walking should implicit within all relevant policies in the Draft Plan;
- Remove or reduce constraints and barriers to walking;
- Provide appropriately designed facilities that are safe, direct, legible, continuous and comfortable for the most vulnerable users (children, elderly, mobility impaired) thereby creating a better environment for all;
- Identify and implement or maintain key walking networks on the basis of specific local trip attractors and public transport services.

The following comments / suggested changes to Section 7.4.6 are also recommended:
- 1st paragraph, page 72 (reference to ‘young people’ and ‘cycle tracks’): reference to young people seems to be too narrowly focused, in terms of walking and cycling’s accessibility qualities. It would be more appropriate to refer to cycle routes, rather than cycle tracks, specifically.
- In relation to pedestrian and cycle routes’ attributes, as referred to above, these should include ‘road safety’.

Recommendation
The Draft Plan should include a cycle network and a walking policy on the basis outlined above.

Car Parking (Chapter 7 and Section 12.11)

Comment
The NTA welcome the proposed reduction of on-street parking spaces in the town centre to help reduce congestion and improve the environment for pedestrians and cyclists (section 7.4.4).

In general, the supply and management of parking is central to the management of transport demand. It has a critical influence on mode choice for trip generating uses such as office, retail and education. It also has a critical influence on traffic
management and the design of new developments and the allocation/design of space in urban areas.

The control of car parking is therefore a key demand management measure to influence travel behaviour in Bray. The NTA would nonetheless strongly recommend that car parking standards are set as maxima in the Development Plan.

The level at which maximum parking standards are set is also of great importance. Where they exist, maximum standards are usually applied with varying degrees of constraint, on the basis of defined location factors such as centrality (for example, town centre locations) and public transport accessibility (taking into account proximity and levels of service, interconnectivity between services/networks). Related to these attributes, the application of parking standards would normally vary inversely with density.

Recommendation
The NTA recommends that the provision for minimum car parking standards should not be included in the Draft Plan. The NTA recommends that maximum standards be applied with varying degrees of constraint, on the basis of defined location characteristics such as centrality (for example, town centre locations), public transport accessibility (taking into account proximity and levels of service, interconnectivity between services/networks).

In locations where the highest intensity of development occurs (e.g. the town centres), an approach that restricts car parking to a maximum number of spaces on an area-wide basis may also need to be considered, in the interests of controlling congestion whilst continuing to maximise development potential.

The Greater Dublin Demand Management Study (GDDMS) recommends that parking provision for new developments should not exceed the maximum standards set out in Figure 1 below (Table 6.2). It is recommended that the car parking standards in the draft Development Plan be amended to reflect the maximum regional parking standards for non-residential uses, proposed in the GDDMS. For example, the Draft Plan specifies a maximum car parking standard for office developments of 1 space per 20/25 gross floor area would imply a high car mode share for future employees.

The GDDMS recommends a maximum car-parking standard for office developments of 1 space per 50 gsqm. In such cases, the implementation of mobility management measures are seen as complementary and necessary to the feasibility of applying this standard.

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3 The GDDMS can be viewed at the following web address: http://www.dta.ie/web2006/TDMS.pdf.
Figure 1: Greater Dublin Demand Management Study (p55)

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<tr>
<th>Table 6.2: Proposed Maximum Regional Parking Standards (non residential use)</th>
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<td>Employment, including offices</td>
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<td>Food retail</td>
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<td>Non food retail</td>
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<td>Higher and further education</td>
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**Cycle Parking (Section 12.12)**

The Department of Transport’s *National Cycle Policy Framework* includes a target that 10% of all trips to work to be made by bicycle by 2020.

**Recommendation**

The minimum cycle parking standards in the draft Development Plan should at least reflect the above target.

**Public Transport Interchange**

**Comment**

The NTA welcomes the provision of land zoned “GTH: Town Gateway and Transportation Hub Uses Zone” at Bray rail station. However it is recommended that the Draft Plan include an objective to prepare a detailed plan for Bray Station and its environs as a basis for the development of a high quality interchange facility and identify associated development opportunities at the station and its environs.

**Recommendation**

It is recommended that the Draft Plan includes detailed objectives relating to the improvement of public transport interchange facilities at Bray rail station.

I trust the above recommendations of the NTA will be addressed and would welcome the opportunity to discuss, should you have any questions relating to them.

Yours sincerely,

Gerry Murphy
Chief Executive Officer

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