

Administrative Officer,
Planning Department,
Wicklow County Council,
Wicklow Town.

9th November 2016

RE: Bray Municipal District Local Area Plan

Dear Sir/Madam,

The National Transport Authority (the “Authority”) has reviewed the material published as part of the pre-draft consultation and makes the following comments:

Legislative Background

Section 19 (2A) of the Planning and Development Act (as amended) states that each planning authority within the GDA shall ensure that its local area plans are consistent with the transport strategy of the NTA. The Transport Strategy for the Greater Dublin Area 2016-2035 (the “Transport Strategy”) was approved by the Minister for Transport, Tourism and Sport in early 2016.

In order to demonstrate consistency with the Transport Strategy, the Authority recommends that the following are considered in the making of the Draft Local Area Plan.

Land Use Integration

Section 7.1.2 of the Transport Strategy sets out a number of strategic and local planning principles, which should guide development in the GDA. These principles must be considered in the making of the Draft Local Area Plan, and are set out below:

- Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations in the GDA;
- To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised;
- High volume, trip intensive developments, such as offices and retail, should primarily be focused into Dublin City Centre and the larger Regional Planning Guidelines (RPG) higher order centres within the GDA;

- Except in limited circumstances, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high capacity public transport;
- The strategic transport function of national roads, including motorways, will be protected by the full implementation of the “Spatial Planning and National Roads - Guidelines for Planning Authorities”;
- All non-residential development proposals in the GDA should be subject to maximum parking standards and based on public transport accessibility;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied;
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing NTA guidance;
- Planning at the local level should promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools;
- New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighbourhoods, in order to give a competitive advantage to these modes;
- Where possible, developments should provide for filtered permeability. This would provide for walking, cycling, public transport and private vehicle access but at the same time would restrict or discourage private car through trips; and
- To the extent practicable, proposals for right of way extinguishments should only be considered where these do not result in more circuitous trips for local residents accessing public transport, or local destinations.

In order for the Draft Local Area Plan to be considered consistent with the Transport Strategy, it must demonstrate that the land use zonings, and the transportation and planning policies and objectives are aligned with the above principles.

Transport Priorities for Bray Municipal District

Chapters 5 and 6 of the Transport Strategy set out the transport investment priorities for the Greater Dublin Area over the next 20 years. While the Strategy timeline is significantly longer than that of the Local Area Plan, many policy measures related to services apply universally throughout the region and are being rolled out on an on-going basis, and many smaller localised infrastructural improvements are identified and undertaken by the Authority on a short to medium-term basis. As such, specific policies and objectives which facilitate or provide for the following should be included in the Draft Local Area Plan:

- The development of the interchange between bus and rail at Bray Train Station;
- Provision for Luas to serve Bray Train Station via the golf club lands;
- Any identified upgrades and enhancements to Bray Train Station buildings and facilities;

- Increased availability of on-street Real Time Passenger Information (RTPI) at bus stops;
- The provision of on-street directional signage to public transport facilities;
- Bus priority measures in Bray Town and Environs, where required, in particular between Bray and Fassaroe;
- Rationalisation and upgrading of bus stops, bus bays and shelters;
- The implementation of the GDA Cycle Network Plan;
- Provision of cycle parking on-street and at public transport stops;
- Provision of a safer, more convenient and more comfortable walking environment, including signage, junction reconfigurations, and improved crossings;
- Capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford) inclusive of ancillary and associated road schemes, to provide additional lanes and upgraded junctions, plus service roads and linkages to cater for local traffic movements;
- Road projects which are in accordance with the Principles of Road Development as set out in section 5.8.3 of the Transport Strategy;
- An area-based parking cap for Bray Town and Environs; and
- Measures which seek to reduce commuter parking and which contribute to greater turnover for parking for non-commuter purposes.

National Transport Authority Guidance Documents

In addition to the above recommendations related to the Transport Strategy, the Authority recommends that the Draft Local Area Plan contains policies and objectives which state that transport and land use planning in Bray Municipal District will be guided by the following documents:

- The National Cycle Manual;
- Permeability Best Practice Guide;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers; and
- Toolkit for School Travel.

Transport Infrastructure Ireland (TII) N/M11 study

As referenced in the pre-draft public consultation booklet, TII are in the process of developing a study for the N/M11 corridor through north Wicklow. The Authority recommends that the Draft Local Area Plan contains a commitment to incorporate the findings of this study. This should include reference to any demand management measures proposed (including those related to land use planning) as well as the recommended transport infrastructure measures.

The Development of Fassaroe

Given the scale of development envisaged for Fassaroe – 6,600 population and 16,000 jobs – the Authority strongly recommends that the Draft Local Area Plan includes a commitment to review the previous Fassaroe Masterplan, which was incorporated into the previous Bray Environs Local Area

Plan in 2010. It is essential in planning for such a level of growth, that development is guided by the most recent data; guidelines; policies and objectives of all relevant stakeholders, in particular the NTA and TII, who were established in the intervening period. This review should be accompanied by a comprehensive transport plan for Fassaroe which would provide certainty as to the transportation requirements for the development area, and provide a basis for its proper and sustainable growth on a phased basis, integrated with the roll-out of transport infrastructure and services.

I trust that the views of the Authority will be taken into account in the making of the Draft Local Area Plan.

Yours sincerely,



Michael MacAree

Head of Planning and Data Analysis
