

Administrative Officer,
Planning and Development,
Wicklow County Council,
County Buildings,
Wicklow Town.

17th February 2016

Re: Draft Wicklow County Development Plan 2016-2022

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Draft Wicklow County Development Plan 2016-2022. In our submission on the Issues Paper, we emphasised the importance of the following:

- The need for a clear and unambiguous policy of prioritisation of residential development land and phasing of growth; and
- A clear policy which states that zoning for employment uses will be done in a manner which protects investment in the national road network;

With the above in mind, and on review of the draft plan in full, the Authority makes the following comments.

Vision and Core Strategy

Since the publication of the Draft Development Plan, the Authority has formally submitted a Draft Transport Strategy for the period 2016-2035 to the Minister for Transport, Tourism and Sport for his determination. The Authority therefore recommends that the section in Chapter 2 related to the previous strategy is replaced.

The projects within the current Draft Transport Strategy of relevance to County Wicklow are as follows:

- Extension of Luas Green Line to Bray;
- Core Bus Corridor on the N11 to Bray;
- Core Regional Bus Route from Wicklow and Arklow;
- Widening of the M50 to three lanes in each direction between Junction 14 (Sandyford) and Junction 17 (M11);

- Capacity enhancement and reconfiguration of the M11/N11 from Junction 4 (M50) to Junction 14 (Ashford);
- Protection of the Leinster Outer Orbital Route Corridor; and
- Increased passenger capacity on the South East Rail Line through the provision of shuttle commuter train services operating south of Greystones, which will interchange with DART services at Greystones.

The Authority welcomes the revised population targets, as agreed with the RPG office, as a temporary solution in the absence of national and regional figures. In terms of the detailed distribution into the settlement hierarchy, the Authority recommends that growth in certain settlements should be prioritised over others. As most people in all settlements in Wicklow, particularly in lower-order settlements, travel to work in other settlements, both in Wicklow and elsewhere, any population growth in such locations will add to the demand for travel in peak hours. As such, those settlements which provide transport alternatives should be prioritised, specifically, those settlements with public transport links to Bray and Dublin.

The Authority recommends that the Core Strategy provides greater clarity in relation to the precise locations for the distribution of the 22,380 new jobs in the County as proposed in the Draft Development Plan, in particular, the 18,340 proposed for settlement levels 1-4. It is also recommended the transport required to serve this growth is set out in the Development Plan, having regard to the Draft Transport Strategy.

Housing

The Authority welcomes the Key Housing Principles set out in section 4.3 of the draft plan and look forward to their application in future Local Area Plans.

Economic Development

The Authority welcomes the land use zoning principles set out in section 5.4 and the objectives in section 5.5, most notably that which states that developments that result in an unacceptable high level of traffic generation will not be permitted. It is recommended that an objective is added to this chapter which states that development will be carried out in accordance with the Department of Environment's "Spatial Planning and National Roads: Guidelines for Planning Authorities".

Infrastructure

Public Transport

It is recommended that reference to BRT serving Bray is removed. It is the intention of the Authority to extend the Luas Green Line to Bray and there is no proposal therefore to deliver BRT.

Reference to the NTA (as the contracting authority for Public Service Obligation transport services, as provided by state transport companies) should be inserted into Public Transport Objectives TR3 and TR7.

It is recommended that Policy TR5 is amended to read as follows:

"To facilitate, through both the zoning of land and the tie-in of new facilities with the development of land and the application of supplementary development contributions, ~~the extension of the LUAS/Bus Rapid Transport to Bray Environs/Fassaroe and linked to Bray DART Station~~ the extension of the Luas Green Line to Bray and an appropriate public transport service to Fassaroe, in accordance with the provisions of the 'Greater Dublin Area Draft Transport Strategy 2016-2035'".

The Authority has serious concerns in relation to the rationale behind the second bullet point under Objective TR7. The location of large-scale residential and employment uses¹ more than 2km from rail stations and Luas stops is contrary to a wide range of transport and land-use planning policies, including those set out in the Authority's Integrated Implementation Plan and the Draft Transport Strategy 2016-2035. Furthermore, the feasibility of providing feeder bus services as an alternative in order to ameliorate traffic impacts of such developments in all cases, and to promote public transport, is questionable.

The Authority recommends that in cases where such proposals are catered for by existing land-use zonings, the zonings are reviewed in the first instance, and in the event that the zonings remain, that close engagement with the Authority is undertaken with a view to providing adequate public transport by way of variations to existing bus services provided as part of the comprehensive metropolitan bus network. In the case that such services cannot be provided, it must then be demonstrated that the proposal will operate in a manner that minimises impact on the road network, for example by applying a more restrictive car parking standard than that which would normally apply, and by committing the applicant to the implementation of a comprehensive workplace or residential Travel Plan. For certain proposals, such plans may include a feeder bus service, if feasible and appropriate. These recommendations are of particular significance for developments which may impact on the carrying-capacity of the national road network.

The rationale behind the fourth bullet point under the same objective, requiring new housing estates to provide "bus-only" links, is also questionable. The Development Plan or Local Area Plan process should identify if bus services are required in each settlement, and the general routings of such services. Bus services will also generally run on distributor roads and not necessarily through housing estates. As such, this objective is unnecessary and may not apply in many cases.

Roads

In relation to national roads, it is recommended that the term "various road agencies" is replaced with "Transport Infrastructure Ireland and the National Transport Authority". In the Draft Transport Strategy, the Authority recognises the constraints on the N/M11 and the south-eastern section of the M50, and proposes to enhance the capacity on these routes. Some of the detailed objectives of the Draft Development Plan related to the N/M11, however, are overly-specific and may not be supported by the Authority. As such, it is recommended that the second, fifth and seventh bullet points are removed. It is also recommended that the following objective is inserted:

¹ large-scale residential development is defined as any single development that would increase the housing stock in the settlement by 10% or more and a large-scale employment development is taken to be one with a working population of 200 persons or more

- Undertake a detailed study and design process for improvements to the N/M11 with Transport Infrastructure Ireland and the National Transport Authority, and adopt the findings of this study as a Variation to the County Development Plan once complete.

Car Parking

In relation to the car parking standards, the Authority welcomes their continued application as maximum standards in areas where alternatives are available.

General Comments

The Authority is fully aware of the constraints that apply to both transport infrastructure and services in County Wicklow – more specifically, the limited capacity on both the road and public transport networks along the east coast. The Authority is also cognisant of the requirement of Wicklow County Council to demonstrate consistency with the prevailing Regional Planning Guidelines, which will be superseded in 2016, and the difficulties in doing so, given such constraints. The Authority will continue to support and collaborate with Wicklow County Council, the Eastern and Midland Regional Assembly, and Transport Infrastructure Ireland in delivering sustainable regional and local spatial planning, and its integration with transport infrastructure and services.

Yours sincerely,



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