

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

13th January 2015

Re: Wicklow County Development Plan 2016-2022 – Issues Paper

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Wicklow County Development Plan 2016-2022 – Issues Paper.

Section 31B(1) of the Planning and Development Act 2000¹ assigns the Authority certain functions in the preparation of a development plan. Where a notice is received by the Authority under section 11(2) it is required to prepare and submit to the relevant planning authority a report on the issues which, in its opinion, should be considered by the planning authority in the review of its existing development plan and the preparation of a new development plan.

Among other issues, such reports should address the following:

- (a) the transport investment priorities for the period of the development plan;*
- (b) the scope, if any, to maximise the performance of the transport system by effective land use planning, and*
- (d) recommendations on the matters to be addressed in the development plan to ensure the effective integration of transport and land use planning.*

The National Transport Authority (the Authority) therefore submits the following observations on the making of the Draft Wicklow County Development Plan 2016-2022, and on the material presented in the Issues Paper.

Transport Investment Priorities

This section deals with transport investment priorities for the period of the Wicklow County Development Plan. The Authority’s Integrated Implementation Plan sets out an infrastructure

¹ As inserted by Section 95 of the Dublin Transport Authority Act 2008

investment programme which identifies the key regional objectives and outputs to be pursued by the Authority from 2013-2018, while the ongoing work between the Authority and Wicklow County Council on the Sustainable Transport Measures Grants Programme comprises the implementation of these objectives on a local scale on an annual basis. The next Government Capital Investment Programme and Greater Dublin Area Transport Strategy will also frame investment in Wicklow County over the period of the Development Plan. Certainty as to the content of these documents is not likely to emerge until later in 2015.

In advance of the next capital programme and transport strategy, and based on the plans which are currently in place, the Authority requests that the new Wicklow County Development Plan 2016-2022 facilitates the priorities and objectives of the Authority which are set out in the remainder of this report.

GDA Cycle Network

The Greater Dublin Area Cycle Network Plan was published in April 2014. The planned network consists of primary, secondary and greenway routes (through parks, along waterways etc.), and comprises a mix of cycle tracks and lanes, cycleways and infrastructure-free cycle routes in low traffic environments. This plan will inform the next decade of NTA investment in cycling across seven local authority areas in the region.

The Authority requests that those elements of the GDA Cycle Network Plan which apply to Wicklow are reflected in the new County Development Plan, with particular reference to the primary routes and the proposed greenways as follows:

- East Coast Trail Greenway, in particular those sections within Bray, Greystones and Wicklow Town;
- Route B1/W4/G1 from Dún Laoghaire Rathdown County through Bray town centre into Greystones;
- The primary network and greenways within Bray, Greystones/Delgany/Kilcoole, Wicklow and Arklow; and
- Routes W13 and W16 – the Arklow to Shillelagh greenway and spur to Avoca.

Public Transport Infrastructure

The Authority is not currently pursuing any major public transport infrastructure proposals in County Wicklow. Long-term proposals may emerge in the making of the next transport strategy in 2015.

General Land Use Recommendations

This section deals with the scope to maximise the performance of the transport system by effective land use planning on a county-wide basis, and the Authority's recommendations on matters to be addressed in the Development Plan to ensure the effective integration of transport and land use planning.

The Integrated Implementation Plan outlines the key principles for the integration of land use and transport and the Authority requests that these principles are reflected in the objectives of the Development Plan, as amended as follows:

- High volume, trip intensive developments, such as offices and retail, should primarily be focussed into Bray, Wicklow Town, Arklow and Greystones;
- The role and function of town centres and villages should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling at these locations;
- All non-residential development proposals should be subject to maximum parking standards and should vary spatially on the basis of centrality and the level of public transport provision;
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be considered;
- For all major employment developments and all new and extended schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with NTA guidance documents – “Toolkit for School Travel” and “Workplace Travel Plans – A Guide for Implementers”. The Development Plan should contain a clear policy reflecting this requirement;
- Residential development located proximate to high capacity existing public transport, such as commuter rail at Bray and Greystones, should be prioritised over development in less accessible locations;
- 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;
- 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. 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. This would give a competitive advantage to these modes and encourage their use as an alternative to the private car; and
- To the extent practicable, proposals for right of way extinguishments should only be considered where these do not result in more circuitous walking and cycling trips for local residents accessing public transport, or local destinations.

Further NTA Response to Issues Papers

In addition to the comments above, the Authority submits the following in response to the Background Issues Papers published as part of this pre-draft public consultation exercise.

Vision and Core Strategy

The Authority acknowledges the concerns expressed in relation to the derivation of population targets for the County. It is strongly recommended, therefore, that in the preparation of the Draft Development Plan – and subsequent local area plans – that a clear and unambiguous policy of prioritisation of residential development land and phasing of growth is introduced. In this manner, the absence of targets which the Council feels are appropriate, or the requirement to revise them, is of less importance as development can proceed in a properly planned and coherent manner. This prioritisation and phasing should be carried out in accordance with the principles set out above.

Enterprise and Employment

The Authority recommends that a clear policy is inserted into the plan which states that zoning for employment uses will be done in a manner which protects investment in the national road network, in accordance with Chapter 2 of the Department of Environment, Community and Local Governments guidelines on 'Spatial Planning and National Roads', and seeks to prevent inappropriate levels of commuter traffic from using such routes in the County.

The N/M11 is a vital economic corridor for the east coast and should not be used to facilitate the development of employment which would be more appropriately developed close to existing public transport services in the existing urban areas of Bray, Greystones, Arklow and Wicklow, or in Dublin. In particular, development to the west of the M11 should not proceed until it can be clearly demonstrated that the potential for such growth does not exist elsewhere in the region, and that it will not have a significant impact on the carrying capacity of the M11, specifically the M11 / M50 junction to the north of Bray. This should be considered in the context of ongoing uncertainty as to the nature of potential future public transport alternatives in this location and the likelihood of such proceeding in the long term.

Sustainable Transportation

The Authority welcomes the transportation commitments outlined in the Issues paper and look forward to seeing how these are given expression via policies and objectives in the Draft Development Plan. The Authority will continue to work with Wicklow County Council in the implementation of schemes which will enhance the public transport, walking and cycling environment across the county, with particular emphasis on the largest urban areas.

The Authority would also like to emphasise the critical role of the rural transport programme in Wicklow and will continue to seek ongoing improvements to the efficiency and effectiveness of services in the county, within the prevailing constraints.

To conclude, the Authority looks forward to working closely with Wicklow County Council in the completion and publication of the County Development Plan, subsequent Local Area Plans and various transport proposals through the Sustainable Transport Measures Grants programme, the emerging Government Capital investment Programme and GDA Transport Strategy, and trust that the Council will take our views into account in the making of the Draft Wicklow County Development Plan.

Yours sincerely,



Hugh Creegan

Director of Transport Planning and Investment