

Administrative Officer,
Planning Section,
Wicklow County Council,
County Buildings,
Wicklow Town.

1st February 2013

Re: Draft Local Area Plan for Greystones-Delgany-Kilcoole 2013-2019

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Draft Local Area Plan (LAP) for Greystones-Delgany and Kilcoole. Our comments are set out in the following sections.

Population and Housing

The Authority acknowledges the requirement for consistency between the Draft LAP and the Regional Planning Guidelines (RPG) for the GDA and the Wicklow County Core Strategy. The zoning of sufficient land to meet the population targets for 2022 is therefore supported in principle.

The Authority does have concerns, however, with the residential densities proposed and the associated extent of land zoned in the plan area. Development lands in Greystones would be classified as “Outer Suburban/Greenfield” according to the Department of Environment, Community and Local Government’s *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)*. These guidelines state that densities of between 35 and 50 dwellings per hectare should be encouraged and densities of less than 30 dwellings per hectare should be discouraged in locations such as Greystones.

The Draft LAP proposes residential development ranging from a density of 2.5 dwellings per hectare to 22 dwellings per hectare. This range sits outside that envisaged by government policy and would also be inconsistent with the Draft Transport Strategy for the GDA which states that “densities will be increased in order to support public transport, walking and cycling”. It is stated that the proposed densities are based on a unit size of 125m² and that potential for higher densities remains if development proposals seek smaller units, as the total number of units permissible will be calculated on the basis of total gross floor area permitted over a site. This approach, while providing some

potential for more appropriate densities, would not be recommended as it cannot guarantee delivery of government policy in this regard.

The currently proposed density regime, and associated need for large amounts of zoned land to accommodate the Core Strategy population, will also fail to deliver on the transport objectives of the Authority for the following reasons:

- A dispersed low-density suburban area would be generally car-dependent due to the difficulties associated with providing public transport which can effectively serve this form of development; and
- People would be less likely to walk and cycle to access local services such as shops and schools due to the distances involved and associated loss in terms of accessibility;

The Authority is cognisant of the historic low-density nature of Greystones, the need to cater for a mix of dwelling types and the current situation in the housing market. However, while a low-density form of development of the currently proposed level may have been acceptable when the population was much lower and less likely to commute long-distances to their places of work, recent developments in the area have been more reliant on the Dublin region for employment. In such a scenario, it is important that development is focussed on locations which maximise access to existing public transport such as the DART station, achieves a level of consolidation which may promote new public transport services, e.g. feeder buses, and which facilitates and promotes walking and cycling to local services.

The Authority believes that the Core Strategy targets for 9 years growth can be achieved with less land zoned for housing, via a modest increase in density to a minimum of 28 dwellings per hectare. This would still lead to a generally low-density housing typology akin to that which has defined the area to date. While such a density remains outside the range referred to in national policy, the Authority accepts the importance of the objective to offer choice in the Greystones housing market, while at the same time providing choice in terms of accessibility by all modes to local services.

A minimum density of 28 dwellings per hectare would help provide for walking and cycling accessibility as well as potentially supporting local bus services within Greystones and improved services to other settlements such as Bray and Dublin. It would also reduce the amount of land zoned overall. The Authority recommends surplus lands are zoned as a "Strategic Land Bank" to be brought forward in the next plan period once the remaining zoned sites are developed.

Related to the level of zoning, the Authority welcomes the commitment to the phasing of development under policies RES2 and RES3. It would be desirable for this commitment to be copper-fastened by identifying the specific sites or action plan lands to be developed in each phase of growth of Greystones-Delgany and Kilcoole, incorporating a "Strategic Land Bank" referred to above. This would form part of the land's zoning objective and would help bring certainty and coherence to the development of the settlement.

Retail

The Authority supports the retail policies of the Draft LAP as they seek to reinforce Greystones and Kilcoole Town Centres and the surrounding Village and Neighbourhood centres, and develop retail in line with demand in a manner consistent with the sequential test. The Authority, while recognising and supporting the clear presumption against retail warehousing in the Draft LAP, would

nonetheless recommend that such a use is only open for consideration on lands zoned TC and E1, and not on lands zoned E.

Employment and Economic Development Strategy

In terms of employment, the Authority supports the broad thrust of the Draft Local Area Plan to provide for jobs in Greystones in order to reduce the level of commuting. The evidence-based approach taken to calculate the extent of land required for employment is to be commended.

In transport terms, the critical consideration for lands zoned for employment is the achievement of a high mode share for walking, cycling and public transport. The most effective way in which this can be achieved is by locating employment lands as close to public transport as possible and by directly integrating such lands into the wider walking and cycling network of the settlement.

With this in mind, the Authority is concerned with the potential development of employment intensive activity at the site zoned E to the south of Charlesland, due to its remoteness from Greystones DART station and proximity to the N11 interchange. It is recommended that any future planning permission for development at this site would be contingent on a clear demonstration of and commitment to the following:

- That the development will not negatively impact on the operation of the existing N11 interchange;
- That all employment generating elements be subject to an area-based mobility management plan. Mode split targets should be established with complementary infrastructural and behavioural transport demand management measures which support the achievement of the Smarter Travel target. For an area in this location, this would equate to a target of between 45% and 60% of trips by single-occupancy car. The level of parking provided should reflect this;
- That any heavy goods vehicles accessing the proposed development would only do so from the N11 and would be prohibited from accessing the development through the existing built-up area of Greystones/Delgany;
- That retail development is not included.

Tourism

The Authority recognises the critical role of tourism in the Wicklow economy and supports policies which aim to enhance and improve this sector in the County. This is of particular importance where schemes have been identified which meet both tourism and transport planning objectives.

Social Infrastructure

The Authority welcomes the plan-led approach to the phased provision of schools in tandem with population growth. Notwithstanding the constraints associated with the provision of school sites, the Authority would encourage the location of primary schools at the centre of neighbourhoods and post-primary schools at the centre of the town or district, in order to maximise access by walking

and cycling from residential areas. While these principles should apply specifically to new development areas, they should be considered at all locations.

It appears from the plan as presented that the schools proposed for Charlesland are located on either side of the Charlesland Road / R774. The Authority strongly recommends that if the school site at Charlesland is to be developed, that consideration is given to building both primary and post-primary schools to the north of Charlesland Road / R774 close to the neighbourhood centre, in order that neither are severed from their catchment by the dual-carriageway. This may take the form of one single school site and may require altering the zonings further in this location to those shown in the plan, perhaps in line with the recommendation under "Population and Housing" above. The school site(s) should be connected directly into Charlesland via walking and cycling routes through residential areas bordering the site, to allow children to access the schools without using the R774. Walking and cycling links to other residential areas would also need to be developed. It is recommended that consideration is given to the inclusion of these proposals in the final LAP.

If such a scenario cannot be realised, it does need to be recognised that, in order to facilitate large numbers of children accessing a school on the other side of the R774, significant works to the R774 may be required. These could include traffic calming, variable speed limits, pedestrian and cycle crossings, including potential signalisation, both at the school and on nearby junctions.

In relation to other proposed schools, whether new or extensions to existing facilities, the Authority recommends that policies are inserted into the plan which state that access by walking and cycling is facilitated to the site(s) from the residential areas of Greystones-Delgany and Kilcoole, and that drop-off facilities and footpaths, walkways and cycle infrastructure are provided in a manner which prioritises pupils and staff in the following order:

- Pedestrians;
- Cyclists;
- Public transport users; and
- Those being dropped-off by car.

Transport and Service Infrastructure

As mentioned at the outset of this submission, the Authority recommends that the LAP takes into account the 5-year Investment Framework drawn up by the Authority in consultation with Wicklow County Council. There is no reference to this in the document as presented and the Authority therefore recommends the insertion of the following policy into the Sustainable Transport section:

- "To provide for public transport, walking and cycling infrastructure in collaboration with the National Transport Authority under the National Transport Authority's funding programmes."

The 5-year Investment Framework sets out a number of potential outline schemes for Greystones as follows:

- Pedestrian Improvements approaching town centre, including widened footpaths;
- Cycle Network – delivery of priority routes identified in the NTA Cycle Network;
- Permeability Projects – new managed shortcuts for cyclists and pedestrians, to access schools, town centre and DART;

- R761 Bray to Greystones Cycle link - Provision of suitable facilities for cycling tourists along the National Cycle Route;
- Bray to Greystones Cliff Walk - Improved connections to amenity;
- Town centre traffic management - improved bus reliability, pedestrian and cycling environment;
- Reduced congestion around schools, with improved access to school for cyclist and pedestrians; and
- Charlesland and South Greystones connectivity to Town Centre by bus, walking and cycling.

The delivery of these schemes – or other possible schemes which may emerge over the lifetime of the framework – would be greatly assisted if the LAP gave them a statutory footing by reference to the Authority’s Investment Framework for Wicklow.

The Authority also recommends that a policy requiring the application of *Achieving Effective Workplace Travel Plans – Guidance for Local Authorities*, published by the NTA in 2012, is inserted into the LAP.

In terms of the road schemes included in the LAP, the Authority proposes to work with the County Council with a view to ensuring consistency between the plan and Measure ROAD 1 of the NTA Draft Transport Strategy, which states that road development in the GDA will satisfy a number of principles, including the following:

- a) That the proposed scheme is consistent with the overall Strategy objectives and Government policies, and that the need which is proposed to be addressed by the road scheme cannot be effectively and satisfactorily addressed by other mode choices;
- b) That alternative solutions, such as traffic management or demand management measures, cannot effectively and satisfactorily address the particular circumstances prompting the road proposal, or are not applicable or appropriate;
- c) That the demand needs or the development needs giving rise to the road proposal are in accordance with the Strategy planning objectives for the region or area impacted by the road proposal;
- d) That the proposed road scheme will not give rise to a significant or unsustainable increase in the overall level of car trips;
- e) That the proposed scheme is consistent with Smarter Travel objectives and targets;
- f) That the road scheme will be designed to provide safe and appropriate arrangements to facilitate walking, cycling and public transport provision;
- g) That any proposed road developments in proximity to residential areas or bypassed town centres should incorporate traffic management measures to reduce traffic speeds to appropriate levels;

It is not clear how the suite of road schemes presented in the plan would achieve consistency with the principles set out above. The Authority consider that some of these schemes essentially comprise bypasses of existing areas and are designed in order to cater for through movement of increased car flows, rather than for the opening up of development lands. Such an approach to the growth of Greystones is likely to compound the level of car use for all trips in the settlement. It is therefore recommended that the roads objectives are revisited with the objective of giving a competitive advantage to walking, cycling and public transport as central.

I trust that the views and recommendations of the Authority will be taken into consideration in the finalisation of the draft Local Area Plan for Greystones-Delgany-Kilcoole.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hugh O'Regan', written over a horizontal line.

Hugh O'Regan
Director of Planning, Investment and Taxi Regulation