

Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town

21<sup>st</sup> June 2013

**Re: Amendments to Draft Wicklow-Rathnew Development Plan**

To whom it may concern,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Proposed Amendments to the Wicklow-Rathnew Development Plan. We would like to reiterate and refer the Council back to our comments in our submissions at both the pre-draft and draft plan stage, particularly as they relate to the following:

- Linking of employment growth to population growth;
- Consolidation of residential development;
- Phasing of development;
- The application of an inappropriately high headroom for employment zoned land;
- The exclusion of Clermont lands from calculations of employment zoning;
- The location and design of schools and their environs; and
- Parking standards.

**NTA Comment on Proposed Amendments**

The Authority has reviewed both the Manager’s Report and the Proposed Amendments and have the following comments to make.

Amendment no. 6:

The Authority has some concern with this amendment and the associated zoning amendments. While the removal of the commentary on historical overzoning is not substantive in policy terms, the Authority is concerned with the insertion of M11-adjacent lands as a focus of the employment strategy for the plan area. This would not be consistent with the principles of sustainable transport planning, unless accompanied by a caveat permitting only employment-extensive uses such as Warehousing, Logistics and Distribution on such lands.

#### Amendments no. 7, 29 and 31:

Following on from the policy-based comment above, the Authority does not support the specific rezoning of an additional 9.29 hectares for employment use in the plan area. This is of particular relevance in the cases of the lands at Rathnew and Ballybeg, which are both located at or close to interchanges on the N/M11. Without the safeguards in terms of specific employment use referred to in the previous paragraph, such an amendment would run contrary to best planning practice, particularly in relation to the lands at Rathnew.

#### Amendment no 9:

The Authority recommends that a policy which states support for the emerging Greater Dublin Area (GDA) Cycle Network is included. This network is currently under development by the NTA and the 7 local authorities in the GDA, including Wicklow County Council. Reference to same under Amendment no. 17 would also be welcome.

#### Amendment no. 11:

The Authority supports this amendment as it aims to provide a coherent and plan-led basis for the development of the Port and Environs.

#### Amendments no. 14 and 15:

The Authority is concerned that the proposed amendments to retail policy may allow for an inappropriate level of out-of-town development. The maintenance of the vitality and viability of the central core is of critical concern to the NTA in terms of promoting public transport, walking and cycling for all trip purposes and in terms of protecting investment in transport infrastructure and services in the town centre. The Authority would therefore recommend revisiting these policies with this in mind.

#### Amendment no. 22:

While the Authority acknowledges that the additional commentary in this section is not substantive in policy terms, there is concern that such a statement – and the rationale behind it – is inconsistent with the principles of cycle network planning as set out in the National Cycle Manual. The Authority would not support a scenario whereby the provision for cycling, and indeed walking, is linked to the development of new roads. Cycling and walking should be provided for on the basis of demand and on the basis of linking origins and destinations in a continuous, safe and direct manner, rather than on the basis of new roads having being built.

#### Amendments no. 25 and 36:

The Authority fully supports this amendment as a means of facilitating and promoting walking in Wicklow-Rathnew for both recreation and utility purposes.

#### Amendments no. 26 and 34

The Authority fully supports the above amendments in line with comments on the provision for schools centrally in relation to existing and planned residential developments in our submission at

the Draft Plan stage. An additional statement which states that access from existing and planned developments will be as direct and convenient as possible for those walking and cycling to school would also be welcome.

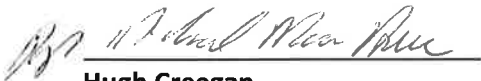
#### **Additional NTA Comments**

The Authority notes the Manager's recommended Objective H4 as a response to the issues raised in our initial submissions and that of the Department of the Environment, Community and Local Government. Such an objective would be strongly supported by the Authority and its exclusion from the final set of proposed amendments is seen as a lost opportunity for residential development in the plan area to be undertaken in a spatially coherent manner.

The Authority also notes the Manager's recommended amendments to the Strategic Land Bank zoning objective. This recommendation is also supported by the Authority as a means of copperfastening the purpose and meaning behind this zoning.

I trust that the views of the Authority will be taken into account in the finalisation of the Wicklow-Rathnew Development Plan.

Yours sincerely,



**Hugh Creegan**

Director of Transport Investment and Taxi Regulation