



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	State Body
Name:	Department of Transport
Reference:	DWTRLAP-165103
Submission Made	November 14, 2024 4:54 PM

Topic

Any other issues

Submission

Accessible, integrated and sustainable public transport.

File

20241113 DoT submission.docx, 0.15MB



Wicklow Town - Rathnew LAP
Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

14th November 2024

Re: Draft Wicklow Town - Rathnew Local Area Plan 2025

The Department of Transport (DoT) welcomes the opportunity to provide the following general observations in respect of the Draft Wicklow Town - Rathnew Local Area Plan 2025. Note that these observations are a statement of the general principles, objectives, and policy imperatives which are under the remit of the Department, to be considered in reviewing or finalising the Draft Wicklow Town - Rathnew Local Area Plan 2025.

Sustainable Mobility

The National [Sustainable Mobility Policy \(SMP\)](#) was published in April 2022 with a target of delivering at least 500,000 additional daily active travel and public transport journeys, and a 10% reduction in kilometres driven by fossil-fuelled cars, by 2030. The [Climate Action Plan 2023 \(CAP23\)](#) updated these targets to a 50% increase in daily active travel journeys, a 130% increase in daily public transport journeys, and a 20% reduction in total vehicle kilometres travelled by 2030.

In line with the principles of the SMP, these targets are to be met by delivering on the following goals, set out in the SMP Action Plan 2022-2025:



PRINCIPLES	GOALS
Safe and Green Mobility	<ol style="list-style-type: none">1. Improve mobility safety.2. Decarbonise public transport.3. Expand availability of sustainable mobility in metropolitan areas.4. Expand availability of sustainable mobility in regional and rural areas.5. Encourage people to choose sustainable mobility over the private car.
People Focused Mobility	<ol style="list-style-type: none">6. Take a whole of journey approach to mobility, promoting inclusive access for all.7. Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model.8. Promote sustainable mobility through research and citizen engagement.
Better Integrated Mobility	<ol style="list-style-type: none">9. Better integrate land use and transport planning at all levels.10. Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.

To this end, Wicklow County Council should seek to ensure that the Draft Wicklow Town - Rathnew Local Area Plan 2025, fully reflects these goals, principles, and objectives to ensure the maximum possible alignment with national efforts to achieve Ireland's climate action targets.

It should be noted that future iterations of the Climate Action Plan or SMP Action Plan may further amend these targets, and Wicklow County Council should endeavour to take account of any such amendments insofar as possible.

Systems Change in Transport

As per a commitment in the Climate Action Plan 2023 (CAP23) to develop a national demand management strategy for transport, the Department held a public consultation process on a draft Strategy, *'Moving together - A Strategic Approach to Improving the Efficiency of Ireland's Transport System'*, between April and August 2024. Submissions to the



consultation reinforced the need for collective action across Government and society not only to help reduce carbon emissions from transport over the medium to long term but to address more immediate issues of congestion, road safety and air quality.

By taking a 'people-centred' approach to the transport system with the aim of improving the efficiency, equity, and well-being of public space, particularly the use of road and street spaces, and by creating conditions that are more amenable and attractive to daily life, active travel, shared mobility and public transport services, local authorities are keenly placed to support a reduction in emissions, with significant co-benefits for Irish society in terms of road safety, air quality, health, and community life as well as assisting in objectives to revitalise urban centres in line with Town Centre First and to improve air quality in line with the [Clean Air Strategy](#).

Air Quality

The negative health effects of air pollution at a localised level, particularly in city centres, are well known. In Ireland, the primary source of localised air pollution is derived from solid fuel burning and traffic congestion. Earlier this year, to address the damaging environmental and public health issues associated with air pollution, the Government approved a new [Clean Air Strategy for Ireland](#) - published by the Department of the Environment, Climate and Communications. The Clean Air Strategy seeks to enhance and protect the quality of air that we breathe through a comprehensive suite of cross-Government policies and measures that targets all sources of air pollution, including those from the transport, agriculture and residential sectors. Amongst its key commitments is an ambition to meet the World Health Organisation (WHO) target values by 2040. The WHO guideline values are set for the protection of health and are generally stricter than the current comparable EU standards.

To address air quality issues arising from the transport sector, the Department of Transport co-chairs the Urban Transport Related Air Pollution Working Group with the Department of



Energy, Climate and Communications. This Group published an updated [assessment](#) of urban transport-related air pollution issues, as well as the measures being taken to address them, in February 2023.

As above, while pollutants originate from several sources, the transport sector accounts for more than 35% of Nitrogen oxides (NOx) and 10% of fine particulate matter (PM2.5). Existing policy measures will go a long way towards reducing transport's contribution to these pollutants, but further action may be needed at national and local level to comply with the timeframes for implementation of the WHO targets, as envisaged within the Clean Air Strategy.

LA Climate Action Plans

These observations should be read in conjunction with the letter which issued on Friday, 20 October 2023 from DoT's Climate Engagement and Governance Division, headed ***Consultation on draft Local Authority Climate Action Plan.***

That letter contained extensive recommendations in relation to drafting of Local Authority Climate Action Plans and offers further guidance re: issues to consider in ensuring that the Draft Wicklow Town - Rathnew Local Area Plan 2025 reflects the necessary policy imperatives required to deliver on Ireland's climate action objectives.

There are a number of key policies and requirements relevant to accessible, integrated and sustainable public transport which the Department of Transport (DoT) considers should be reflected in the proposals.

Accessible public transport for All, and especially for Disabled People, Persons with Disabilities, Persons with Reduced Mobility and Older People.



- the “whole of Government” **National Disability Inclusion Strategy (NDIS) 2017-2022** included specific actions assigned to local authorities. For example, action 108 related to the ‘dishing’ of footpaths and action 109 related to accessible infrastructure, including bus stops. Lack of dishing is often cited as a major concern for wheelchair users. The Department of Children, Equality, Disability, Integration and Youth are currently finalising the new National Disability Strategy.
- the **United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)** puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas. The DoT welcomes the text (Page 15, Section 2.9 Infrastructure and Services of Written Statement), *‘Ensure the pedestrian environment can be used by all people, regardless of their age, size, disability or ability’*.
- making transport fully accessible for all requires a **‘whole journey approach’**. This refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment’. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.
- the Design Manual for Urban Roads and Streets (**DMURS) Interim Advice Note – Covid-19 Pandemic Response** includes guidance that designers should ensure that measures align with the principles of universal design, consider Government policy on accessibility for people with disabilities and consult people with disabilities to further appraise measures.
- the **Connecting Ireland Rural Mobility Plan (2022-2025)** is a major national public transport initiative with the aim of increasing public transport connectivity, particularly for people living outside the major cities and towns.

Department of Transport can assist with appropriate text in the development plan regarding integrated, accessible public transport if desirable.



Central Policy, Coordination and Reform

An Roinn Iompair

Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60

Leeson Lane, Dublin, D02 TR60

T +353 (0)1 604 1177

gcu@transport.gov.ie www.gov.ie/transport