



Draft Wicklow Town – Rathnew LAP Submission - Report

Who are you:	State Body
Name:	National Transport Authority
Reference:	DWTRLAP-155246
Submission Made	November 20, 2024 4:16 PM

Topic

Overall Vision and Strategy of LAP

Submission

Please see attached a submission on behalf of the National Transport Authority.

File

NTA_Submission_WCC_Draft_Wicklow_Town-Rathnew LAP_FINAL.pdf, 0.37MB

Wicklow Town-Rathnew LAP,
Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town.
A67 FW96.



An tÚdarás Náisiúnta Iompair
Teach Mhargadh an Fhéir
Margadh na Feirme
Baile Átha Cliath 7, D07 CF98

National Transport Authority
Haymarket House
Smithfield, Dublin 7, D07 CF98

01 879 8300
info@nationaltransport.ie
www.nationaltransport.ie

20th November 2024

Re: Draft Wicklow Town-Rathnew Local Area Plan 2025

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft Wicklow Town-Rathnew Local Area Plan 2025 (hereafter, LAP) and the associated Local Transport Assessment (hereafter, LTA), and based on the Greater Dublin Area Transport Strategy 2022 – 2042 (hereafter, the Transport Strategy), which is a consideration material to the proper planning and sustainable development of the Greater Dublin Area (GDA), would submit the below comments and recommendations for consideration.

1. Overview and Policy Context

From a review of the Draft LAP and LTA, it is considered that the Plan is generally consistent with the Transport Strategy, as required by the Planning and Development Act 2000 (as amended), subject to the observations and recommendations set out in this report. These observations and recommendations are based on the following policy and guidance documentation, as well as the primary provisions of the Wicklow County Development Plan 2022 – 2028.

National Investment Framework for Transport in Ireland (NIFTI)

This is the strategic framework for future investment decision making in land transport. It guides transport investment in the years ahead to enable the National Planning Framework, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland.

NIFTI sets out the road user modal hierarchy in Ireland as; *1. Active Travel (Walking & Cycling); 2. Public Transport; 3. Private Vehicles.*

NIFTI also outlines an intervention hierarchy which is: *1. Maintain; 2. Optimise; 3. Improve; 4. New.*

National Sustainable Mobility Policy

This sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.

Climate Action Plan 2024

Under the Climate Action and Low Carbon Development (Amendment) Act 2021, emissions must reduce by 51% by 2030, setting a path towards a zero net-emissions scenario by 2050. The transport sector is committed to meeting those targets in full. For transport, there are three main actions required that should inform the policies, objectives and measures of the Local Area Plan, namely:

- Reducing the demand for travel;
- Increasing use of public transport, walking and cycling and a reduction in trips by car;
- Conversion of the transport fleet to zero emissions vehicles

National Planning Framework (NPF)

The National Planning Framework sets out the National Policy Objectives (NPO) which align with the National Development Plan (NDP) through delivery of National Strategic Outcomes (NSO).

Eastern & Midland Regional Assembly – Regional Spatial & Economic Strategy

The RSES provides a high-level development framework for the Northern and Western Region that supports the implementation of the NPF.

Greater Dublin Area Transport Strategy 2022 – 2042

The Transport Strategy sets out a framework for the delivery of transport infrastructure and services in the GDA region as well as key policy objectives that support the integration of land use and transport planning at a local level.

As part of the Transport Strategy, there is an objective to extend DART services to Wicklow Town by 2042, whilst the M11 corridor is designated as a ‘Regional Bus Corridor’, with ancillary objectives to provide for park and ride facilities along this route.

2. Local Transport Assessment

The preparation of a ‘Local Transport Assessment’ for Wicklow Town – Rathnew, to accompany the LAP, is noted and welcomed given the importance of integrating land use and transport planning, as set out in the Transport Strategy. An integrated approach will ensure that the future transport needs of the Plan area are a central consideration as the Council identify land use objectives and zonings and this can support sustainable travel patterns in the area going forward.

Whilst the provisions of the transport assessment undertaken are generally welcomed, subject to the observations detailed below, it is noted that the LTA has not been undertaken in line with the ABTA guidelines which are used for the preparation of Local Transport Plans. Objective CPO 12.3 of the Wicklow County Development Plan states the following:

“In collaboration and with the support of the relevant transport agencies, to prepare and / or update existing Area Based Transport Assessments and Local Transport Plans for all towns in Levels 1-4 of the County settlement hierarchy (namely Bray and environs, Wicklow–Rathnew, Arklow, Greystones–Delgany, Blessington, Baltinglass, Enniskerry, Kilcoole, Rathdrum and Newtownmountkennedy and any other settlement where it is deemed necessary by the Planning Authority) and utilise these assessments and plans to inform land use and investment decisions, including the preparation of future Local Area Plans.”

NTA Recommendation

- To ensure the future transport needs of Wicklow Town-Rathnew are identified based on a robust and comprehensive assessment, it is recommended that the current transport assessment prepared for the town is further developed in consultation with the NTA to form a Local Transport Plan (LTP), in line with the updated ABTA guidance; and
- The preparation of a LTP be included as a specific objective of the LAP in line with Objective CPO 12.3 of the Wicklow County Development Plan.

3. Active Travel Proposals

The assessment undertaken of existing active travel infrastructure in the settlement is noted and the recommendations to improve existing infrastructure and provide new infrastructure, are welcomed.

It is submitted, however, that active travel measures should be more explicitly identified, with a focus on establishing coherent and integrated walking and cycling networks for the whole settlement. These networks should be detailed in the LAP and LTA, particularly on the 'Transport Strategy Map', that at present primarily identifies the proposed roads projects for the settlement. This network should be based on the current GDA Cycle Network, as published as part of the Transport Strategy. In addition to the core walking and cycling networks, a comprehensive assessment of potential permeability measures should be undertaken to identify potential active travel connections that could reduce walking and cycling times between areas and to key services and public transport stops.

The existing recommendations and objectives of the LTA could be further strengthened by measures aimed at improving junctions from an active travel perspective, reducing speed limits and providing more frequent and high-quality pedestrian crossings. Greater reference should be made to the Design Manual for Urban Roads and Streets and the Cycle Design Manual in this regard and the hierarchy of road users should be incorporated which should form the basis for the identification of measures generally.

Furthermore, objectives would be welcomed that target an increase in bicycle parking at key destinations as well as facilitating bicycle/scooter/car share schemes that can accommodate increased rates of active travel use and reduce the need to own a private vehicle.

Further to the above, it is submitted that that information should be provided on the potential phasing of active travel measures, which measures will be prioritised and the rationale for same, given potential funding limitations. This can ensure the most primary transport corridors based on demand, potentially in proximity to schools and other key destinations, are served by improved infrastructure in the short term.

NTA Recommendation

- Reference to the hierarchy of transport users, as set out in the *National Sustainable Mobility Policy* should be made in the LAP and LTA;
- Active travel measures should be more explicitly identified in both the LAP and LTA with a focus on identifying overall walking and cycling networks, to be included on appropriate maps in both documents;
- An assessment of potential active travel permeability measures throughout the town should be undertaken to identify measures with the potential to reduce walking and cycling times between areas and key services including public transport stops and schools;
- Further objectives could be included aimed at improving existing junctions, reducing speed limits and providing more frequent and high-quality pedestrian crossings;

- Greater reference should be made to the *Design Manual for Urban Roads and Streets* and the *Cycle Design Manual*.

4. Public Transport Measures

The inclusion of objectives seeking the further enhancement of public transport infrastructure is welcomed including Objective WTR78 of the LAP which references future enhancements to rail services. It is submitted that a similar objective should be included referencing support for the continued enhancement of bus services under the Connecting Ireland programme, which at present is not referenced in the LAP or LTP. General objectives to support the continued improvement of bus stop infrastructure and the potential identification of new stops should also be included. Furthermore, it is requested that the routing of bus services is a central consideration in any active travel projects, to ensure service routings are protected and enhanced where possible.

NTA Recommendation

- Include appropriate objectives to support the continued enhancement of bus services under the *Connecting Ireland* programme;
- Include general objectives to support the continued improvement and addition of bus stop infrastructure in the settlement.

5. Car Parking

The NTA is concerned at the extent of land shown on the ‘Transportation Strategy Map’, which is subject to an objective to develop a car park on the Port Access Road, adjacent to Wicklow Train Station. It is noted that the extent subject to the objective as well as a ‘Public Utilities’ zoning objective is in excess of the land parcel currently the subject of a Part 8 proposal to develop a car park at this site, along with bus stops and active travel infrastructure. Given the quantum of parking proposed under the Part 8 application in addition to the existing car parking provision at the station, it is considered that any further provision of parking could be excessive and could attract additional car traffic into Wicklow-Rathnew, particularly in the context of strategic bus-based park and ride being proposed at present at Junction 16 of the M11.

This objective is also of concern given that it would not be in accordance with the principles of proper and sustainable Transit-Oriented Development planning as it would negate the potential delivery of housing or employment development at this strategically important site. Transit-oriented development is a key objective of the Transport Strategy under Measure Plan7 which states the following:

*“Measure PLAN7 – Transit-Oriented Development
The NTA will continue to support and facilitate the delivery of Transit-Oriented Development at locations identified as appropriate for such, and will work with EMRA and the local authorities in identifying further locations served by existing and proposed public transport which are appropriate for high density development supporting a mix of uses.”¹*

Given the objective to extend the DART to Wicklow Train Station under Measure RAIL3 of the Transport Strategy, it is considered that the function of this area as a key transport hub will be enhanced over time and that as a result this land bank could accommodate mixed use development of a relatively high density.

¹ Greater Dublin Area Transport Strategy 2022 – 2042, Chapter 8, Page 62.

With regards to the provision of parking generally in the settlement, it is considered that the LTA and LAP could be strengthened in terms of objectives to reduce parking over-time in central areas and generally manage it to ensure sustainable forms of transport are encouraged and facilitated. To facilitate a reduction and consolidation of parking over time, it is recommended that a car parking management strategy is undertaken to accompany the LTA. This could assist with objectives to improve active travel facilities and the general urban environment in town centres through the reallocation of road space.

NTA Recommendation

- Review the extent of land identified for car parking at the Port Access Road adjacent to Wicklow Station, in the context of the planned strategic Ashford Park & Ride facility and the Transit-Oriented Development principle;
- Prepare a car parking management strategy for the settlement to consider a reduction in on-street parking and a consolidation of parking at appropriate sites on the periphery of core town-centre areas.

6. Modal Share Ambitions

It is noted that the Office of Planning Regulator (OPR) typically favour the inclusion of modal share targets as part of a LAP. It is submitted that this should be considered and that generally there should be stronger objectives to reduce private car use in the settlement in favour of active travel and public transport trips. This is in the context of the existing dominance of the car for trip making in the settlement and in the context of wider national objectives to reduce car use, including the objectives of the Climate Action Plan 2024. The Climate Action Plan seeks to reduce daily car journeys by 25% by 2030 and increase the number of active travel journeys in the same time frame by 50%.

NTA Recommendation

- Consider the inclusion of modal share ambitions for the Plan area in the LTA and LAP.

7. Integration of Local Area Plan & Local Transport Assessment

The concurrent preparation of a Local Area Plan and Local Transport Assessment represents an important opportunity to ensure that both existing areas and future development locations in the town are well served by sustainable modes of transport and to generally link land use objectives with transport objectives. In this regard, it is important that the primary objectives and measures of the LTA, including appropriate network maps for active travel and public transport, are integrated to the LAP. The LAP objectives should also express support for the current or forthcoming active travel projects that are being advanced in the settlement including the Station Road active travel scheme. To ensure the LAP provides a comprehensive overview of the primary measures and objectives of the LTA, it is recommended that the LAP has a dedicated transport chapter.

The provisions of the LAP that support a compact and sequential form of development for residential and retail uses are welcomed. Such provisions will assist in promoting a pattern of development that supports trips by sustainable modes of transport. It is, however, submitted that the compact and sequential approach to development should also apply to economic development and this should be noted in the LAP. In particular, it should be highlighted that trip intensive forms of employment uses should not be considered appropriate in peripheral areas not served by sustainable transport. Furthermore, the principle of Transit-Oriented Development should be an objective of the LAP given the proposed enhancements to the public transport network in the settlement.

NTA Recommendation

- Incorporate the primary measures, objectives and network maps of the LTA into the LAP as part of a dedicated transport chapter;
- Ensure that appropriate objectives are in place in the LAP to promote a sequential and compact form for employment-based development, with a focus on locating trip intensive development at locations well served by sustainable modes of transport;
- Include appropriate objectives to support Transit-Oriented Development in line with the provisions of the GDA Transport Strategy.

I trust that the views of the NTA will be taken into account by the Council in the progression of the Wicklow Town-Rathnew Local Area Plan.

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning