

	<h1>Greystones-Delgany &amp; Kilcoole LPF Variation No.4</h1>
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<b>Who are you:</b>	State Body
<b>Name:</b>	National Transport Authority
<b>Reference:</b>	GDKLPF-170647
<b>Submission Made</b>	June 19, 2025 5:09 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

## Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole

## Local Planning Framework PART B Settlement Specific Objectives.

- B.7 Infrastructure, including transport and flooding

**Write your observations here:**

Please see full submission attached.

**Please select which town you want to comment on:**

Greystones/Delgany, Kilcoole

**Upload a File (optional)**

NTA\_Submission\_WCC\_Draft\_Greystones LPF\_FINAL.pdf, 0.39MB

Variation No. 4,  
Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town.



18<sup>th</sup> June 2025

**Re: Draft Greystones/Delgany & Kilcoole Local Planning Framework (LPF) 2025 under proposed Variation No. 4 to the Wicklow County Development Plan 2022 - 2028**

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft Greystones/Delgany & Kilcoole Local Planning Framework (LPF) 2025, 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 LPF, 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 (hereafter Wicklow CPD).

### *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 2025

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 Eastern & Midland 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 enhance DART services to Greystones as part of the Dart+ Project, whilst the M11 corridor is designated as a ‘Regional Bus Corridor’, with ancillary objectives to provide for park and ride facilities along this route, including at Junction 11 to the southwest of Greystones.

## **2. Local Transport Plan**

The NTA is concerned that the Draft LPF has not been published alongside a Local Transport Plan (hereafter, LTP), particularly given the scale of the settlement (c. 22,000 population in 2022) and the population growth forecast for future years. It is noted that the preparation of a LTP is an objective under ‘CPO 12.3’ of the Wicklow CDP that 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.”<sup>1</sup>*

Whilst it is noted that the transport elements of the LPF have been based off the work done to date for a LTP for the area, it is considered that the transport element of the LPF requires further detail, with consideration of the items raised in this submission and through further liaison with the NTA. It is submitted that the finalisation of the LTP would accommodate this additional analysis and ensure the future development of Greystones is based off a local planning and transport planning policy

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<sup>1</sup> Wicklow County Development Plan 2022 – 2028, Chapter 12, Section 12.8.

framework that adequately integrates land use and transport planning, based on the Area Based Transport Assessment (ABTA) guidance. The NTA are of the view that when the LTP is finalised, any elements that are of material difference to the provisions of the LPF, should be included in the LPF by way of a new variation.

#### ***NTA Recommendation***

- To ensure the future transport needs of Greystones are identified based on a robust and comprehensive assessment, it is recommended that, in consultation with the NTA, the LTP is finalised at the earliest opportunity and any material changes to the LPF are captured by way of a new variation.

### **3. Active Travel Provision**

The provision made for active travel as part of the Draft LPF is noted and generally welcomed, however, it is considered that additional measures are required to ensure a modal shift towards sustainable modes can be adequately promoted and facilitated in the town.

It is noted that no assessment appears to have been undertaken of potential active travel permeability measures that could reduce walking and cycling times between areas and to key services and public transport stops. It is submitted that a map of such measures should be prepared. Further objectives could also be included aimed at improving existing junctions, reducing speed limits and providing more frequent and high-quality pedestrian crossings.

The transport elements of the LPF could be further strengthened with the inclusion of supporting measures such as bicycle parking at key destinations and objectives aimed at facilitating bicycle/scooter/car share schemes that can accommodate increased rates of active travel use and reduce the need to own a private vehicle.

It is submitted that any new measures identified should be included as part of the associated 'Implementation Programme'.

#### ***NTA Recommendation***

- 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;
- Supporting measures should be included that can facilitate a shift to sustainable modes and reduce the level of reliance on the private vehicle for trip making;
- Further objectives could be included aimed at improving existing junctions, reducing speed limits and providing more frequent and high-quality pedestrian crossings.

### **4. Car Parking**

It is submitted that the LPF should include objectives that seek a reduction and consolidation of car parking in the town centre with a view to providing enhanced walking, cycling and public transport infrastructure and that the Council should strive to prepare a Car Parking Strategy to deliver on these objectives. This would align with Measure Road13 and Measure TM19 of the Transport Strategy which support a reallocation of roadspace to sustainable modes of transport. It is also important that the LPF acknowledges and support the Transport Strategy's ambition to deliver a new park and ride at Junction 11.

**NTA Recommendation**

- Include objectives that seek a reduction and consolidation of car parking in the town centre and seek the preparation of a Car Parking Strategy to deliver on these objectives.

**5. 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 Local Area Plan. 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.

**NTA Recommendation**

- Consider the inclusion of modal share ambitions for the Plan area in the LPF.

I trust that the views of the NTA will be taken into account by the Council in the progression of the Greystones/Delgany & Kilcoole Local Planning Framework (LPF) 2025.

Yours sincerely,



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Michael Mac Aree  
**Head of Strategic Planning**