



Draft Blessington Local Area Plan Submission - Report

Who are you:	State Body
Name:	National Transport Authority
Reference:	DBLESSLAP-100315
Submission Made	December 10, 2024 10:08 AM

Topic

Overall Strategy of the LAP

Submission

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

File

NTA_Submission_WCC_Draft_Blessington_LAP_FINAL.pdf, 0.36MB

Blessington 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

9th December 2024

Re: Draft Blessington Local Area Plan 2025

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the Draft Blessington 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, the N81 corridor is designated as a ‘Regional Bus Corridor’, with an objective to provide for enhanced levels of bus priority on this route.

2. Integration of Local Transport Assessment and Local Area Plan

The preparation of a ‘Local Transport Assessment’ for Blessington, 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.”¹

The key outputs of the ABTA process which the NTA recommends are given full expression in a Local Transport Plan are as follows:

¹ Wicklow County Development Plan 202 – 2028, Chapter 12, Page 281.

- 1) Map of Proposed Permeability and Walking Interventions;
- 2) Cycling Network Map;
- 3) Map of Proposed Cycling Schemes graphically represented by Short-Term, Medium-Term and Long-Term Priority;
- 4) Proposed Public Transport Services Route Map;
- 5) Map of Proposed Public Transport Interventions;
- 6) Road Network Map;
- 7) Traffic Circulation Map; and
- 8) Map of Proposed Roads and Traffic Management Interventions, including Car Parking.

In order to ensure that sustainable transport is central to statutory land use planning policy in Blessington, the following should be provided for in the LAP:

- A Comprehensive stand-alone Transport Chapter;
- A set of transport policies and objectives which explicitly reflect the NSMP, NIFTI, DMURS, CDM, and any relevant regional or metropolitan Transport Strategy; and the accompanying Local Transport Plan; and
- All 8 Key Outputs of the Local Transport Plan outlined above as fully and explicitly expressed in text and figures.

Further detail on these aspects is provided later in this report.

NTA Recommendation

- To ensure the future transport needs of Blessington 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), closely aligned with the updated ABTA guidance; and
- In the event that the LTA is not further developed in line with the above as part of the finalisation of the LAP, the preparation of an LTP should 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, including locations where permeability schemes are required to reduce walking distances to key services such as schools. These networks should be detailed in the LAP and LTA as part of legible maps.

Further to the above, it is submitted that that information should be provided on the potential phasing of the primary 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. It is submitted that with regards to potential active travel and general traffic management measures for Main Street, measures should not be solely reliant on the delivery of the relief road and that appropriate targeted measures are brought forward in the short term to improve the urban environment of Main Street for people walking and cycling.

Specific measures related to reducing speed limits, improving the safety and function of junctions for active travel use and providing more frequent and high-quality pedestrian crossings could be more explicitly portrayed and highlighted. It is also submitted that the hierarchy of road users should be incorporated and should form the basis for the identification of measures generally.

From an assessment of the LTA, it is noted that there is limited information provided on the potential for an increased provision of bicycle parking at key destinations in the town, despite the *Town Centre First Plan* highlighting the limited provision of bicycle parking in the town at present. Furthermore, there is currently an absence of objectives to provide for 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 appropriate objectives should be incorporated into the LTA and LAP to support the provision of such schemes going forward.

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;
- Further objectives could be included and more explicitly identified aimed at improving existing junctions, reducing speed limits and providing more frequent and high-quality pedestrian crossings;
- Objectives should be included to improve the number and quality of bicycle parking locations at key destinations, particularly at Main Street;
- Objectives should be included to support the provision of bicycle/scooter/car share schemes at appropriate locations in the town.

4. Public Transport Measures

It is considered that objectives seeking the further enhancement of public transport infrastructure and services should be referenced in both the LAP and LTA/LTP. This should include referencing support for the continued enhancement of bus services under the Connecting Ireland and Bus Connects programmes and the improvement of bus stop environments. 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* and *Bus Connects* programmes;
- Include general objectives to support the continued improvement and addition of bus stop infrastructure in the settlement.

5. Car Parking

With regards to the provision of car parking generally in the settlement, it is considered that the LTA/LTP 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/LTP, in line with the recommendations of the *Town Centre First Plan*. This could assist with objectives to improve active travel facilities and the general urban environment in the town centre through the reallocation of road space.

NTA Recommendation

- 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/LTP.

7. Employment Development

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.

The provisions of the LAP that support a compact and sequential form of development for residential and retail uses are therefore 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.

NTA Recommendation

- 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.

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

Yours sincerely,



Michael Mac Aree
Head of Strategic Planning