



Pre Draft Bray LAP Submission - Report

Who are you:	Private Individual
Name:	Fearghal Rooney
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17/12/24

Re: Bray Local Area Pla: Submission – related to the Upper Dargle Road.)

Dear Sirs

[REDACTED] I am writing to submit my priorities for the Local Area Plan, which I trust you will consider and incorporate into the draft for consultation. My inputs relate to public infrastructure, community development, and environmental enhancements. As a member of this community, I believe it is essential to address the current issues to enhance our neighbourhood's quality of life.

Context: The northern end of Upper Dargle Road has many long-standing and elderly residents and continues to attract new residents. We all have individual needs, such as ease of local access to nearby services, space for parking to assist with mobility issues, and connections to the wider community. As residents, we consider ourselves part of the wider Dargle area. We regularly interact and socialise with our community on Lower Dargle Road and in People's Park. Bray would benefit from enhanced community infrastructure between Upper Dargle Road and People's Park.

Please incorporate the following treatments for Upper Dargle Road in the future LAP:

1. **Inclusion in the Dargle River Local Community:** Upper Dargle Road should be considered within the Dargle River local community (refer to section 7.4 of the current LAP). Steps should be taken to strengthen linkages in this area by enhancing local infrastructural connections.
2. **Road Status Reduction:** Reduce the status of the Upper Dargle Road from regional to local, or consider it "local" in the context of planning, as it fits that definition more than "regional."
3. **Local Residential Parking:** Maintain and secure local residential parking at its current levels and incorporate it into infrastructure plans. Parking control measures (e.g., permit parking) may be used to manage this.
4. **Public Transport Line:** The Upper Dargle Road should no longer be considered a public transport line required for the development of Fassaroe. The Bray & Environs study 2019 has been superseded by the November 2021 publication prepared by the NTA in conjunction with Jacobs/Systra, which rightly removes the Upper Dargle Road bus priority for Fassaroe development.
5. **Public Transport Volume:** Maintain, but do not increase, the volume and extent of public transport from the current 185 local link (L15).
6. **Dargle Road/Herbert Road Link:** Continue to maintain the objective to consider a Dargle Road/Herbert Road link.
7. **Greenway Link:** Promote and prioritize a Greenway link from Dargle Road to the town, including Upper Dargle Road within this plan to maintain community linkages.

8. **Environmental Concerns:** Address the use of environmentally inappropriate dirty/“smoking” fuels in the Dargle area. The LAP should prioritize regular monitoring in close proximity, education, enforcement, and retrofitting to improve the area’s air quality.

Context of the above:

While Upper Dargle Road was once an important regional road connecting Wicklow to Wexford, it now functions more as a local road. There is dense residential development immediately adjacent to the carriageway, with many houses having no land in front and doorways opening directly onto the public pavement.

Sections of Upper Dargle Road are unsuitable for heavy vehicles or fast traffic and were not designed to carry large traffic volumes or speeds (including HGVs and many buses). Any plans to further increase bus capacity or traffic volumes raise practical and engineering concerns and impact the community and environment. The shift away from large regional buses has continued with the redirection of the 133 bus, leaving only the local 185 (L15) bus.

The road is busy but generally not congested. The nature of the road makes it difficult for residents to enjoy the area and limits opportunities for community activities and interactions.

Its current use indicates that it may not be necessary to maintain it as a regional road. Reducing its status could allow for modifications that better serve the local community’s needs, such as traffic calming measures or the development of pedestrian-friendly zones. Maintaining local access and parking capacity should be protected.

There is a large portion of elderly residents in this area whose needs must be considered. Many require “call-in” nursing, easy access for shopping deliveries, and local family support. All of this requires easy access to nearby safe parking. They also need safe pedestrian access to their community. Younger families have different needs but require the same ease of access to parking and pleasant, safe, local pedestrian and cycle linkages to the town.

The needs and preferences of residents who live and work in the area should take precedence over other considerations to ensure that the development aligns with the community’s vision and enhances their quality of life. This should be a consideration for any nearby development proposal.

As residents, we have chosen to utilize an e-bike (cargo) as our secondary mode of transport for our “local” (Bray) trips, which include school runs and social/community trips. Currently, Upper Dargle Road, and in connection, Castle Street and Main Street, are not constructed and prioritised in a way that encourages sustainable transport. Many residents have commented that they feel unsafe cycling on this road due to car speeds and proximity.

More active travel trips would be taken if the appropriate infrastructure were in place. Resident parking is still needed where active travel or longer trips are not appropriate, however the frequency of car use by residents for local trips have the capacity to lessen and therefore the number of cars per households should lessen.

The air quality of the area is impacted by the use of dirty and “smoking” fuels by residents. This particularly affects the quality of air on winter nights. I understand no air quality monitoring is being undertaken nearby (the nearest is on Southern Cross Road). Monitoring, education, enforcement, and retrofitting should be encouraged to improve the air quality of the area.

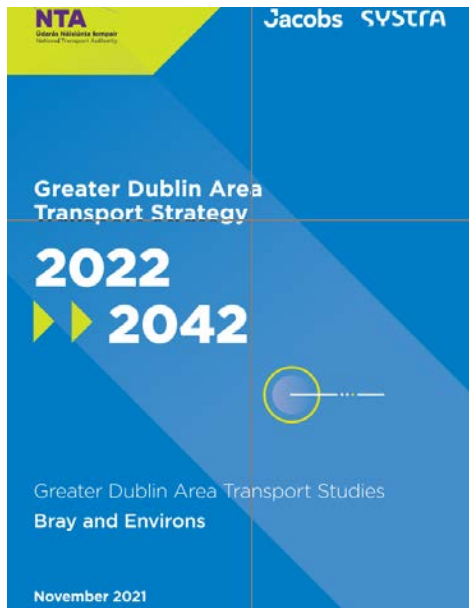
All of the above are connected to the strategic and environmental considerations to the area.

I consider the above to be in line with national and county-level policy and trust that you will incorporate these within your LAP. Below are selected extracts of national policy. There are many more.

Kind regards,
Fearghal Rooney

[Redacted signature]

Connection to current policy (encl):



Bray & Environs study 2021

****Remove the bus priority scheme as condition to Fassaroe development. ****

November 2021 publication of the Bray and Environs prepared by the NTA, Jacobs & Systra now supersedes the 2019 Bray and Environs Transport Study. As such the bus priority scheme referred to in the 2019 scheme (Upper Dargle Road including the approach to Sunnybank Junction) should now be abandoned for the purposes of facilitating development to Fassaroe and / or the greater Bray & environs strategic transport planning.

As there is no congestion on the road (except at the junction of castle street at peak hours, due to castle street congestion) , it seem there is no longer a need for this scheme.

The 2021 Report is comprehensive and includes consideration of national regional and local policies.

This is welcomed as there is already significant developments planned and commenced adjacent to the northern end of the Upper Dargle road - Castle street. It seems highly unconstructive to funnel new Fassaroe development into the heart of bray, via Castle Street and main street, which is already congested and will likely come under further pressure in the future.

It is noted that The Fassaroe development will be benefiting from the N/11 park and ride and plans for a busway to Old Conna

Its is also note that the report also refers to the Herbert road / Dargel road bridge option, and the greenway on the Dargle road.

The Bray and environs report (2019) is referred to in the current LAP and a Bray & Environs study is referred to in the County development plan. The findings and options contained within the 2021 version should now be incorporated in the 2025 Bray LAP.

Wicklow County Development Plan 2022 – 2028

*The vision set out in the WCDP (WCC 2022) as (areas **emphasised**) : ‘To guide and facilitate the sustainable growth of the County in a manner which **supports a deep respect for its unique natural heritage**, capitalises on the potential of our towns and villages to deliver compact growth, facilitates **healthy placemaking, supports the creation of self-sustaining settlements** and rural areas that **are attractive places to live in, work in and visit**, provides for new job opportunities, embraces climate action and enables the transition to a low carbon, climate resilient and environmentally sustainable economy, **improves sustainable mobility and conserves our heritage**’*

As you can see, the current county Development plan encourages healthy placemaking and settlements that supports our heritage, which must also include the mobility needs of our long-established communities. This needs to be at the centre of planning policy and transport infrastructure planning.

WCDP (WCC 2022) (refer to emphasis)

*RPO 4.39 To promote the consolidation of the town centre with a **focus on placemaking and the regeneration** of strategic sites to provide for **enhanced town centre functions and public realm, in order to increase Bray’s attractiveness as a place to live, work, visit and invest in***

*RPO 4.40 To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray. **The development of Bray-Fassaroe should be undertaken in collaboration between Wicklow County Council, Dún Laoghaire-Rathdown County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure and services (ie. Align with on the 2021 bray & environs report)***

*RPO 4.41: Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and **‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance. (ie. Prioritise local communities whilst still recognising their need to park as it is impossible to undertake all journeys via alternative modes).***

Bray LAP 2018

5.4 Bray Neighbourhood Centres Specific Objectives

*BT4 Within designated neighbourhood centres at Boghall Road / Ballywaltrim, Vevay Road, **Dargle Road**, Dublin Road – **Little Bray**, Albert Road and walk, Fassaroe and Bray Southern Cross Road, it is the objective of the Planning Authority to **protect, provide for, and improve the mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community**, to a degree that is akin to their role and function as outlined in the Retail Strategy and the objectives of this plan.*

The above objective aligns with my submission. This intent of this objective should be maintained and encompass the development of Transport Infrastructure.

Encouragement to Cycling as a local mode of transport.

This is aligned by policy, namely:

Upper Dargle Road in Bray is identified as a Secondary Route in the 2022 Greater Dublin Area Cycle Network.

Additional link from the River Dargle Greenway have been added to the Primary Route along Dublin Road in Bray, with connections at Lower Dargle Road

Wicklow County Development Plan 2022-2028

Chapter 12... *the implementation of local projects which support pedestrian and cyclist permeability, safety and access to schools and public transport...*

Bray to City Centre Core Bus Corridor Preferred Route Option Report.

section 3.5, outlines the extent of the interface with the new bus corridor ending at the junction of castle street and upper Dargle road and seeks to accommodate and complement the existing environment such as, for example:

“• The design was also further developed between Ravenswell Road and Dwyer Park to provide for continuous cycle lanes and bus lanes while minimising the impact on properties and the heritage wall at Belton Terrace;

• The road alignment at the Upper Dargle Road junction in Bray was further reviewed and updated to avoid impact to the Pine tree under preservation (Tree Protection Order). A two-way cycle track connection was provided from the junction to tie-in to the existing two-way cycle track through the grounds;

• On Castle Street in Bray pedestrian crossing locations have been revised to better serve the main desire lines and pedestrian access points”

With reference to the above it is note that existing conditions should be considered and incorporated into Transport planning.

4.4.2 Dublin Area Revised Bus Network,

Identifies Upper Dargle road as only accommodating the L15 bus, which, broadly, is a replacement of the current 185 bus route. It is also worth noting that the report does not identify, or recommend, any “peak” or “express route”. This should be maintained. There should be no increased service which will only act to congest the town of bray.

WCDP (WCC 2022) - chapter 15, environmental

Section 1 0- Introduction (goals)

- Creating a clean environment for a healthy society;
- Ensuring adequate capacity and systems to manage waste in an environmentally safe and sustainable manner;

- Addressing air quality in urban and rural area through better planning and design; -

Incorporating consistent measures to avoid, mitigate and minimise or promote the pro-active management of noise;

15.1.4

Air Quality Framework Directive 1996 Ambient Air Quality and Cleaner Air for Europe (CAFE)
Directive 2008 Ambient Air Regulations 2009 Air Quality Standards Regulations 2011

15.2 (climate action)

improving energy security, and addressing air pollution impacts on human health. For example...transport sector, and the retrofitting of existing buildings with electricity-powered heat pump systems, are expected to result in significant improvements in local air quality metrics and health outcomes.

CPO 15.9 To regulate and control activities likely to give rise to emissions to air (other than those activities which are regulated by the EPA).

CPO 15.11 To require activities likely to give rise to air emissions to **implement measures to control such emissions, to undertake air quality monitoring and to provide an annual air quality audit.**