



# Pre Draft Bray LAP Submission - Report

Who are you:	Private Individual
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Reference:	BRAYLAP-164623
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## Topic

Compact Growth - Housing – Population Growth

### Submission

Higher Densities in Urban locations, where there is good leisure infrastructure, parcs, green spaces, gyms etc. Increased height (but ensure that there are shared or communal spaces for socialisation .  
Bray town centre above shops so that the town is a living space which would make it a safer space (perception), the 'old' superquinn shopping centre could be rethought.

## Topic

Heritage – Biodiversity- Green infrastructure- Climate Action- Energy

### Submission

Knocksink - and zoned lands above need deep and brave reconsideration.  
All hedgerows are worth protecting and developments in rural areas should NOT be allowed plant quick growing ridiculous species like Cherry Laurel as an example.  
Reduce the quantity of concrete and tarmac in all developments, increase green infrastructure and consider living building styles, rain water harvesting and use vegetation as modes of traffic calming.  
Stop building in flood zones.

## Topic

Infrastructure - Sustainable Movement – Transportation

### Submission

Increase public transport infrastructure, invest heavily in clean, frequent, reliable cheap transport that is over interconnected offering choice and user person friendliness.  
Reduce traffic in all towns, like plastic bag levies, make people get out of their cars, increase cyclepaths, and also have people living in towns above shops as an option, make our towns living spaces.  
Perception is the problem for people in moving from car to public transport etc, Make them change and they will do it!

## File

BDP\_Submission\_LornaKelly.pdf, 0.19MB

Bray MD LAP  
Administrative Officer  
Planning Department  
Wicklow County Council  
County Buildings  
Station Road  
Wicklow Town

Online submission: <https://bray-md-lap-wicklow.hub.arcgis.com/>

**Dáta | Date**

17/12/2024

**Ár dTag | Our Ref.**

TII24-129562

**RE: Bray Municipal District Local Area Plan (LAP), Pre- Draft consultation**

Dear Administrative Officer,

TII acknowledges notice of the pre-draft stage of the preparation of the Bray Municipal Local Area Plan (LAP) 2025 – 2031. TII's observations seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy outlined in the Section 28 Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), the Trans-European Transport Networks (TEN-T) and the *EMRA Regional Spatial and Economic Strategy* (RSES).

Therefore, TII makes the following observations for the Councils consideration:

## 1. STRATEGIC DEVELOPMENT CONTEXT: NATIONAL ROADS

National roads play a key role within Ireland's overall transport system and in the country's economic, social and physical development. The national road network provides strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports, and provides access between all regions in the state.

The M/N11 national primary road, is a strategic national road and is included as part of the EU Trans-European Transport Networks (TEN-T). The TEN-T regulations define the objective of increasing the benefits for road users by ensuring co-ordinated safe, secure and high-quality standards for road users and freight transport to achieve integrated and intermodal long-distance travel routes across Europe. The Council will be aware that the national primary road corridor is identified as part of the TEN-T Comprehensive Network. Such a designation has repercussions and action requirements for policies and objectives which should be considered in the preparation of the LAP. In addition, the N/M11 also includes N11 Junction 6 (Bray (Centre)), Junction 7 (Bray (South)), Junction 8 (Kilmacanogue), and Junction 9 (Glen of the Downs) which requires careful consideration of the impacts on national roads during the review and preparation of the Bray Municipal Local Area Plan.

Having regard to the foregoing, the Council will be aware that National Strategic Outcome (NSO) 2 of the National Planning Framework (NPF) includes the objective to maintain the strategic capacity and safety of the national roads network, including planning for future capacity enhancements.

While Chapter 7 'Enhanced Regional Accessibility' of the National Development Plan (NDP) sets out the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. NPF National Policy Objective (NPO) no. 74 secures the alignment of the NPF and the NDP through delivery of National Strategic

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Outcomes (NSO). The above requirements are reflected in the publication of the National Investment Framework for Transport in Ireland (NIFTI) and the National Sustainable Mobility Policy as well as existing Statutory Section 28 Ministerial Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012)

In addition, maintenance and protection of the strategic function of the national road networks and associated junctions are amongst the guiding principles of the transport strategy of the Eastern and Midland Assembly Regional Spatial and Economic Strategy (RSES) at *Regional Policy Objective* (RPO) 8.1. RPO 8.1 promoting integration of land use and transportation planning includes the Integrated Land Use and Transportation Guiding Principle set out at section 5.6; *“The strategic transport function of national roads and associated junctions should be maintained and protected.”*

RPO 8.2 promotes the management and enhancement of strategic land transport networks, including by travel demand management. In addition, RPO 8.3 requires future development is to be planned and designed in a manner that *inter alia* maximises the efficiency and protects the strategic capacity of the metropolitan area transport network both existing and planned and further protects and maintains regional accessibility. This RPO reinforces RPO 5.2 to support the delivery of key sustainable transport projects. In addition, the critical international dimension of the TEN-T network explicitly including the N/M11 and Rosslare Europort, is reflected in RSES Regional Policy Objective RPO 8.16.

Finally, the NTA *Greater Dublin Area Transport Strategy 2022-2024* at Measure ROAD2 sets out *National Roads Requirements* explicitly complementary to the Guidelines and includes provision *“1. The primary function of national roads is to cater for strategic traffic and this function must be protected”*.

## RECOMMENDATION

It is of particular importance that policies and objectives of the upcoming plan are drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve economic competitiveness and regional accessibility by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

There is a critical need to manage these assets in accordance with official Government policy as outlined in the DoECLG *Spatial Planning and National Road Guidelines for Planning Authorities*, the TEN – T Regulation ((EU) 2024/1679, the National Planning Framework, the National Development Plan and the National Investment Framework for Transport in Ireland.

TII would welcome consideration by the Council of including as a Core Strategy Objective/Guiding Principle in the Draft Local Area Plan strategic objectives to reflect the foregoing policy requirements, which are summarised as:

- a) to maintain the strategic function, capacity and safety of the national roads network, including planning for future capacity enhancements, and
- b) to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades, are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users.

**Reason:** To ensure conformance with official policy provisions included in NPO 74/NSO 2, RPO 8.1 and RPO 8.2.

## 2. ENHANCED REGIONAL ACCESSIBILITY

As you are aware the Authority is developing/progressing major national road schemes and improvements within the region identified in accordance with NDP investment commitments giving effect to NPF NSO 2.

The Authority’s other priorities in relation to national roads, as outlined above, are the maintenance of the existing national road network, including junctions, and safeguarding the Exchequer investment in national roads to date.

In accordance with National Development Plan investment objectives, the following scheme is identified and should be incorporated and considered in the Draft Local Area Plan:

- N11M11 Bus Priority Interim Scheme

The Council will be aware that the implementation of all national road schemes is subject to budgetary constraints and is subject to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the relative priority or timeframe for national road schemes may be subject to alteration.

It is recognised that the Council may consider it appropriate to identify any local improvements to national roads planned by the Council over the term of the Local Area Plan that may be incorporated into the Plan.

The Authority advises that while any additional improvements relating to national roads identified at a local level should be done so in consultation with and subject to the agreement of TII, the Council will be aware that TII may not be responsible for the funding of any such schemes or improvements.

Also, any additional connectivity to national roads should be developed in accordance with the requirements of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012) and be subject to an appropriate evidence base.

In addition, the Council is reminded that elements of the national road network are operated and managed by a combination of Public Private Partnerships (PPP) Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII.

Any contemplated works that may impact the national road network including pavement, structures and infrastructure including drainage and any alterations to existing crossings, including by under or over pass will require prior consultation with TII and compliance with all relevant national road network technical and standards requirements as prescribed in TII Publications.

The Council will be aware that that future Luas, Metro and BusConnects are a matter for the NTA.

#### **RECOMMENDATION:**

In accordance with National Development Plan investment objectives, policies and objectives providing for and safeguarding the provision of the N11M11 Bus Priority Interim Scheme should be incorporated into the Draft Local Area Plan.

**Reason:** To ensure conformance with official policy provisions included in NPO 74/NSO 2.

### **3. LANDUSE AND TRANSPORT INTEGRATION**

Having regard to the N/M11 bisecting the Municipal District and settlement areas, and the pre-draft material including a section entitled “infrastructure – sustainable movement – transportation” section, TII is of the strong opinion that land use transportation assessment is necessary to inform any future LAP and should be prepared on the basis of an evidence-based area transport assessment in accordance with the requirements of the *Spatial Planning and National Roads Guidelines* and the *Greater Dublin Area Transport Strategy* for demonstration of their compatibility with the strategic function of the national road network.

Regional Policy Objective (RPO) 8.6 of the RSES requires Local Transport Plans (LTPs) to be prepared for selected settlements in the Region that includes Bray as a “Key Town”. RPO 8.6 is amongst those repeated in the *GDA Transport Strategy* that as part of the Strategy holds *MEASURE PLAN17 – Local Transport Plans* to be based on the ABTA methodology as part of the statutory plan-making process. County Plan *Sustainable Transport Objectives* at Chapter 12 include *Sustainable Mobility Objectives* where CPO 12.3 is to prepare and / or update existing Area Based Transport Assessments (ABTAs) and LTPs for all towns in Levels 1-4 of the County settlement hierarchy including *Bray and environs*.

Section 1.4 of the TII *Traffic and Transport Assessment Guidelines* (2014) addresses Area Based Transport Assessment (ABTA) for Forward Planning. In addition, guidance is also available in TII Publications PE-PDV-02046 (*Area Based Transport Assessment (ABTA) Guidance Notes*), jointly prepared by TII and the NTA.

TII strongly recommends that any land use transportation assessment to support the LAP should be prepared taking account of the ABTA Guidance.

Having regard to the important strategic transport role of the N/M11 and its position within the LAP area creating the potential for impacts from objectives of the LAP on the maintenance the safety, capacity and strategic function of the national road network, TII requests that it is formally recognised as a critical stakeholder in the draft LAP process. Furthermore, having regard to TII ABTA Guidance, it is requested that TII be formally engaged in any ABTA process to be undertaken to inform the Draft LAP.

TII welcome and support consultation alongside the NTA during the preparation of the Local Area Plan informed by the ABTA methodology where there may be implications for the national road network in the area, TII projects and infrastructure.

**RECOMMENDATION:**

TII strongly recommends the preparation of land use transportation assessment during the preparation of the Local Area Plan to be informed by the ABTA methodology.

**4. GREENWAYS AND NATIONAL CYCLE NETWORK (NCN)**

TII has a limited remit, designated by the Department of Transport, which includes greenways and the development of a plan for an inter-urban cycle network, recently published as the National Cycle Network Plan (NCN).

Therefore, in relation to any Greenway and National Cycle Network Plan (NCN) proposals in the vicinity of the LAP, consultation with the local authority internal project and/or design staff is recommended.

**5. CONCLUSION**

TII welcome and support consultation by the Council's Executive during the preparation of the Local Area Plan to ensure the implications for the national road network, TII projects and infrastructure in the area.

Please acknowledge receipt of this submission.

**Yours faithfully,**



**Cliona Ryan, Land Use Planner**  
**on behalf of**  
**TII Land Use Planning Unit**