

Greystones-Delgany & Kilcoole LAP,  
Administrative Officer,  
Planning Department,  
Wicklow  
County Council,  
Station Road,  
Wicklow

2<sup>nd</sup> February, 2024



Dún Scéine, Lána Fhearchair  
Baile Átha Cliath 2, D02 WT20

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[www.nationaltransport.ie](http://www.nationaltransport.ie)

## Re: Greystones-Delgany & Kilcoole Local Area Plan Pre-Draft Consultation

Dear Sir/Madam,

The National Transport Authority ('the NTA') welcomes the opportunity to comment on the *Greystones-Delgany & Kilcoole Local Area Plan Pre-Draft Consultation*. These comments are based on prevailing national policy, the Greater Dublin Area Transport Strategy (hereafter, the Transport Strategy) and the manner in which the NTA would envisage these being implemented at the local level in Greystones-Delgany & Kilcoole. These comments also have regard to the work which has been undertaken to date on an Area Based Transport Assessment ("ABTA") for the plan area and the preparation of a Local Transport Plan ("LTP").

### 1. National Policy

Under the Climate Action and Low Carbon Development (Amendment) Act 2021, emissions from transport are required to be reduced by 50% by 2030, setting a path towards a zero net-emissions scenario by 2050. 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.

The *National Sustainable Mobility Policy*, sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve the 50% reduction in carbon emissions by the end of this decade. The Policy sets out to deliver at least 500,000 additional daily active travel and public transport journeys and a 10% reduction in kilometres driven by fossil fuelled cars by 2030.

The National Investment Framework for Transport in Ireland (NIFTI) is the strategic framework for future investment decision making in land transport. It will guide 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*. It also outlines an intervention hierarchy which is: 1. Maintain; 2. Optimise; 3. Improve; 4. New.

### *Recommendation*

The NTA recommends that the Draft LAP, and associated LTP should set out how its policies and objectives align with national policy for transport planning and investment, and land use and transport integration.

## **2. GDA Transport Strategy**

The Transport Strategy includes the following transport measures which are relevant to the Greystones-Delgany & Kilcoole area:

- Delivery of a comprehensive cycle network and supporting measures;
- Delivery of DART+ Coastal South;
- Delivery of new park & ride facilities including at Greystones;
- Delivery of the BusConnects Network Redesign programme which will improve connectivity in the plan area;
- Delivery of an enhanced Regional Bus Corridor on the M11; and
- The Preparation of a Local Transport Plan (LTP)

The Transport Strategy includes the following principles for the integration of land use and transport planning:

- Consolidate development into city, town, suburban and village centres in accordance with the 15-minute city and neighbourhood concept
- Consolidate development around existing and proposed public transport services and facilities
- Increase densities in future residential and employment developments
- Prioritise mixed-use development which reduces the need to travel
- Ensure that all new development areas will be fully permeable for pedestrians and cyclists through the application of the principle of filtered permeability whereby through traffic by private car is discouraged
- Deliver schemes to improve permeability for walking and cycling in existing developed areas
- Ensure that the layout of new developments will prioritise walking and cycling and enable the efficient provision of public transport services

The Transport Strategy also includes a wide range of measures in the areas of school planning and design, freight movement, traffic management and integration of transport infrastructure and services, all of which should be considered as part of the preparation of the Draft LAP and LTP.

### *Recommendation*

The NTA recommends that, in preparing the Draft LAP and supporting LTP, the local authority incorporates the transport priorities and measures; principles for the integration of land use and transport planning; and supporting measures as appropriate, from the GDA Transport Strategy.

## **3. Local Transport Plan**

The NTA welcomes the engagement to date on the preparation of a Local Transport Plan for Greystones-Delgany & Kilcoole and, with reference to the *Guidance Note on Area Based Transport Assessment* (published by the NTA and TII), would emphasise the importance of the following:

- Identification of transport weaknesses and constraints;
- Collation and analysis of relevant transport data;
- Establishment of mode share ambitions;

- Early engagement with key stakeholders such as Transport Infrastructure Ireland;
- Establishment of the transport networks for each mode based on LSMATS;
- Identification of measures required to deliver the transport networks;
- Iteration between the LTP and LAP in terms of land use objectives, including zonings;
- Phasing, implementation priorities and monitoring; and
- High-quality presentation of material.

The NTA will continue to closely cooperate with Wicklow County Council throughout the preparation of the LTP.

#### *Recommendation*

The NTA recommends that Wicklow County Council re-establish a working group with the NTA in order to steer the preparation of the LTP and the associated iteration with the LAP. The Draft LAP should incorporate the key transport measures and policies of the LTP and reflect its land use and transport integration principles. The NTA would also recommend that the LTP and LAP are reviewed together at each stage of the LAP process in order to ensure their consistency with each other and with prevailing national and regional transport and land use policies.

#### **4. National Transport Authority Guidance Documents**

The NTA recommends that the preparation of the Draft LAP is informed by the following NTA guidance, available on the NTA website:

- The National Cycle Design Manual;
- Permeability: A Best Practice Guide;
- Rapid Build Active Travel Facilities Advice Note;
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities;
- Workplace Travel Plans: A Guide for Implementers; and
- Toolkit for School Travel

#### **5. Conclusion**

I trust that the views of the NTA will be taken into consideration in the preparation of the Draft Greystones-Delgany & Kilcoole Local Area Plan, and we look forward to continued engagement with the Council during the preparation of the Local Transport Plan.

Yours sincerely,



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**Michael Mac Aree**  
Head of Strategic Planning