

Administrative Officer  
Planning Department  
Kildare County Council  
Áras Chill Dara,  
Naas,  
Co. Kildare

2<sup>nd</sup> February 2011

Dear Sir/ Madam,

**Re. Draft Kildare County Development Plan 2011-2017 (Proposed Amendments)**

The National Transport Authority (the “Authority”) submits the following comments on the proposed amendments to Draft Kildare County Development Plan 2011-2017.

The Authority firstly welcomes the inclusion of a number of amendments addressing issues highlighted in its previous submission on the Draft Development Plan. In particular, the Authority considers;

- Amendment 3.1 in relation to the sequential approach to towns, villages and other settlements,
- Amendment 6.6 which sets out a policy to the review Parking Standards over the lifetime of the plan, and
- Amendment 6.7 which supports the development of a Freight Strategy for the county following the production of the NTA Transport Strategy for the GDA,

to be positive additions to the Draft Development Plan.

As you will be aware, the Dublin Transport Authority Act, 2008 (as amended) requires that the Authority considers draft Development Plans in terms of their consistency with the Authority’s Transport Strategy for the GDA. The Authority is currently in the process of finalising its draft Transport Strategy for public consultation and welcomes the continued involvement of Kildare County Council in its development. In this context, the Authority has concerns in relation to the proposed amendments to the Draft Development Plan which it considers would

need to be satisfactorily addressed to ensure that it is consistent with the forthcoming Transport Strategy.

In addition, the Authority has reviewed the proposed amendments in the context of the Regional Planning Guidelines for the Greater Dublin Area (RPGs), and has identified a number of issues which should be addressed to ensure consistency between the RPG and the Development Plan. These matters are set out in the following sections.

### **Core Strategy/ Settlement Strategy (Chapter 2/3)**

The Authority welcomes the reference (in proposed Amendment 3.1) to the requirement for *'all towns, villages, settlements, rural nodes (as appropriate) to be developed in a sequential manner, with suitable undeveloped lands closest to the core and public transport routes being given preference for development in the first instance.'*

The Authority notes that this approach is compliant with the requirements of the RPGs. The Authority recommends that the Development Plan also emphasises the role of sequential planning in the prioritisation of, and access to, services in the county. In this regard, and in the context of any potential downward revision of population projections by the DoEHLG, it is important that the sequential approach strongly favours the allocation of growth into the higher order settlement centres. No criteria have been specified in the draft Development Plan to guide the phasing of development land, and the Authority would reiterate the importance of linking the location and sequencing of new development to the settlement hierarchy, and the development phasing of zoned land to public transport accessibility at a strategic level, and walking and cycling accessibility at the local level, to employment, education and services (at the appropriate level of locality).

In relation to the proposed *'strategic land use and transportation study for North East Kildare'* (proposed Amendments 3.3 and 3.6), the Authority, notwithstanding its previous comments on the draft Development Plan in relation to proposed major town centre development within this area, would foresee the NTA having an important guiding role as a strategic stakeholder in the development of this study. The Authority would therefore recommend that the NTA be referred to directly in Development Plan Objective SO10. The Authority, through its forthcoming Transport Strategy, encourages the use of transport plans at a local level as a basis for informing development objectives (and *inter alia* associated scaling, phasing, and transport interventions) at the local level, also taking into account the wider strategic impacts of development both within and external to the plan area. These local transport plans will play a key role in the funding and prioritisation of strategic and local transport interventions in the GDA.

## **Transportation (Chapter 6)**

### **Local Traffic Plans**

Under Section 65 of the Dublin Transport Authority Act 2008, each local authority is required to prepare a *Local Traffic Plan* for its functional area. This must be consistent with the *Strategic Traffic Management Plan* to be produced by the NTA on completion of the Transport Strategy. It is the view of the Authority that in addition to the statutory documents listed for consideration in proposed Amendment 6.2, the Movement and Transport chapter of the Development Plan (Chapter 6), should refer directly to the local authority's requirements under Section 65 of the Act. The Authority also recommends that this section identifies the role of the 'Local Traffic Plan' in relation to the identification of, and requirement for, new road schemes or improvements to existing roads. The Authority would recommend that the following objective be added in this regard;

*Review, and set out an implementation plan, for proposed road schemes as part of a Local Traffic Plan to be prepared following the publication of the NTA Transport Strategy for the GDA and the completion of the NTA integrated Implementation Plan.*

### **Parking**

The Authority welcomes proposed Amendment 6.6 which seeks to review all parking standards during the lifetime of the Development Plan. The Authority recommends that this policy includes a specific objective to incorporate the maximum regional parking standards and related measures, which will be specified, when available, in the forthcoming NTA Transport Strategy for the GDA.

### **Freight Strategy**

The Authority welcomes proposed Amendment 6.7, (To support a freight strategy in County Kildare following the preparation of the NTA Transport Strategy for the GDA).

## **Environs Plans (Chapter 18)**

The Authority supports the fostering of sustainable economic growth focused on the areas referenced in the *Economic Development Strategy* of the RPGs for the Greater Dublin Area. In County Kildare, Maynooth /Leixlip (with Kilcock and Celbridge in a supporting role) and Naas/Newbridge (including a supporting role from Kilcullen) are designated as primary economic growth towns. Athy and Kildare Town are designated as secondary economic growth towns.

However, the zoning of additional employment zoned lands on the periphery (i.e. adjacent to the existing development boundaries) of these settlements and in their wider hinterland areas has the potential to undermine the development of these

towns on a more consolidated, accessible, economically competitive and environmentally sustainable basis, effectively serving urban and rural catchments, in terms of employment, education and the provision of services.

The Authority therefore recommends that when considering the zoning of any additional lands at or beyond the edge of settlements, the Development Plan presents a clear supporting rationale in conjunction with the proposed zoning objective, setting out the specific economic rationale for such zoning and relating it to the status of the town in the RPG Economic Development Strategy and the Development Plan's settlement hierarchy.

In all cases, it should be demonstrated that the zoning objectives support the objectives of increasing accessibility between people and workplaces and ensuring appropriate use of transport infrastructural investments and sustainable transport modes, as advocated in the Regional Planning Guidelines, should be set out.

It is in this context, that the Authority highlights its concerns in respect of the zoning of Industry/Warehousing to the west of Naas, and in particular, the additional zoning of lands as presented in proposed Amendment 18.4. The rationale for additional zoned lands at this location does not appear to be aligned with the settlement or economic policies of the RPGs, or the requirements for the provision of sustainable transport, as set out in the forthcoming NTA Transport Strategy.

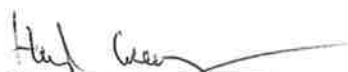
The Authority would also question the zoning of additional lands for Industry/Warehousing to the east of Athy (proposed Amendment 18.10 –AE1), the rationale for which has not been clearly demonstrated, particularly in the context of the current quantum of land zoned for Industrial/Warehousing within the Athy Town Council area.

The Authority would therefore recommend that Amendment 18.4 and 18.10 (AE1) be excluded from the Kildare Development Plan.

## **Conclusion**

It is the view of the Authority that the issues outlined in this letter will need to be addressed by the Council to ensure that the Council's Development Plan is consistent with both the Regional Planning Guidelines and the Authority's forthcoming Transport Strategy for the GDA. The Authority would be happy to further expand on the issues raised, if required.

Yours sincerely,



**Hugh Creegan,**  
*Director of Transport Planning and Investment.*