

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

2rd February 2011

Dear Sir/ Madam,

Re. Draft Naas Town Development Plan 2011-2017 (Proposed Amendments)

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

The Authority firstly welcomes the inclusion of a number of amendments addressing issues highlighted in the Authority’s previous submission on the Draft Naas Town Development Plan. In particular, the Authority considers:

- proposed Amendment 7.7, which requires the Local Authority to prepare a ‘Local Traffic Plan’ following publication of the NTA Transport Strategy;
- proposed amendments 7.5 and 7.6, which are related to the Authority’s previous recommendations on Car Parking Standards; and
- the requirement for a Freight strategy for Naas;

to be a positive addition 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 Naas Town Council in its development. In this context, the Authority has concerns in relation to the proposed amendments to draft Development Plan which it considers would need to be

satisfactorily addressed to ensure the required consistency between the Development Plan and the forthcoming Transport Strategy.

In addition, the Authority has reviewed the Development Plan amendments in the context of the Regional Planning Guidelines for the Greater Dublin Area (RPG), 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.

Transportation (Chapter 6)

Parking

The Authority welcomes proposed Amendment 7.5 which seeks to review all parking standards during the lifetime of the 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 in the forthcoming NTA Transport Strategy for the GDA.

Freight Strategy

The Authority welcomes proposed Amendment 7.6 which supports the development of a Freight Strategy for the county following the production of the NTA Transport Strategy for the GDA.

Road Programme Objectives

RP02 (proposed Amendment 7.11)

The Authority would recommend that the objective to construct a road, providing a link between the town centre and Sallins station be retained in the Development Plan, as connectivity with the rail station is seen as an essential element of this link, in particular for the purpose of interchange between rail and local bus and in general, to render Sallins station accessible to the development lands in the North West Quadrant. The NTA would therefore not support this amendment.

RP03 (proposed Amendment 7.12)

Accessibility to workplaces and services by walking, cycling and public transport are key elements of the forthcoming NTA Strategy. The Authority recommends that, as far as possible, urban road proposals should be guided by the objective of providing more direct routes for public transport, walking and cycling from residential areas to key destinations (town centre/services/employment). Road proposal RP03, as amended, would no longer provide a direct link from the large established residential area in the north east quadrant of the town to road proposal RP02, which in turn, would directly link with the employment zoned lands at Millennium Park. Without this link, the benefits which could otherwise accrue from this road proposal

would be diminished. The Authority would therefore question the rational for this road proposal, as amended.

RP06 (Amendment 7.13)

In conjunction with RP02, the Authority would consider this road to be an important strategic link for public transport, walking and cycling between Naas town centre, the Millennium Park employment lands and Sallins station. The Authority would therefore recommend that the objective to facilitate this link be retained.

Urban Design and Opportunity Areas (Chapter 12)

Indicative Strategy for Fairgreen (Amendment 12.6)

Accessibility to schools and other services, particularly by walking and cycling and public transport, are key elements of the forthcoming NTA Strategy. The Authority would question the removal of the indicative vehicular (and in particular) the indicative pedestrian access route in Figure 12.6, linking Corban's Lane (and the two schools) to areas to the south of Fairgreen. The Authority would recommend that this proposal be retained in the Development Plan.

Land Use Zoning (Chapter 14)

Agricultural Lands to New Residential (Amendment 14.5)

The proposed rezoning of the subject area to New Residential, should be contingent on the following matters being addressed:

- the preparation of a phasing strategy for the development of the area;
- addressing any severance issues arising from the design of the existing local distributor road network serving the site; and
- a corresponding objective to provide public transport services directly serving the location and connecting with the town centre and other key destinations in the town.

White Land to New Employment and Enterprise in NW Quadrant (Amendment 14.7)

The Authority supports the fostering of sustainable economic growth, focused on those areas (including Naas), referenced in the *Economic Development Strategy* of the RPG for the Greater Dublin Area. . Related to this, the Authority supports the prioritisation of development on employment zoned lands within the Naas Town Council area. It is in this context that the Authority would support the proposed amendment. The Authority would, however, highlight the existing low mode share for public transport, walking and cycling among people currently employed in the NW Quadrant area. The Authority would therefore recommend that in addition to and in complement with the proposed zoning amendment, the Development Plan include an objective to improve the public transport, walking and cycling mode share

for employment related trips in this area. This could be linked to the proposals to develop a 'Local Traffic Plan' (Amendment 7.7).

Conclusion

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

Yours sincerely,



Hugh Creegan,
Director of Transport Planning and Investment.