

Forward Planning Section,
Kildare County Council,
Áras Chill Dara,
Devoy Park,
Naas,
Co. Kildare

18th July 2012

Re: Draft Kildare Town Local Area Plan

Dear Sir/Madam,

The National Transport Authority (“the Authority”) welcomes the opportunity to comment on the Kildare Town Draft Local Area Plan (LAP).

The Dublin Transport Authority Act 2008 provides that each planning authority within the GDA shall ensure that its local area plans are consistent with the Greater Dublin Area Transport Strategy for the period 2011-2030. The draft Transport Strategy is complete, and is currently with the Minister for Transport, Tourism and Sport for approval. While the Transport Strategy is a draft document, the Authority requests that Kildare County Council reflect the policies, objectives and measures contained within the draft Transport Strategy in the Kildare Town LAP.

The Authority considers that the draft LAP, as it is presented, is generally consistent with the draft NTA Transport Strategy. The Authority would however draw attention to the following issues which should be taken into account in the preparation of the final LAP.

Population and housing

The Authority acknowledges and supports the designation of Kildare town as a ‘Moderate Sustainable Growth Town’ within the Regional Planning Guidelines 2010-2022 (RPGs). The Authority recognises that as such, Kildare town should develop in a self-sufficient manner, with the aim of reducing commuting levels and ensuring sustainable levels of housing growth. Kildare town should

also provide for a full range of local services adequate to meeting the local needs of the town and the surrounding rural areas. As a 'Moderate Sustainable Growth Town', Kildare should also seek to encourage economic opportunities through the provision of high quality transport connections, good social infrastructure provision and a strong local labour market.

The Authority's draft Transport Strategy is aligned with the above principles and with the settlement strategy approach to development set out in the RPGs. In particular, the draft Transport Strategy emphasises the need for development consolidation, and the focussing of significant development in locations which are compatible with the provision of high quality public transport.

With reference to Chapter 3 of the Kildare County Development Plan 2011-2017, it is noted that there is residential zoned land within Kildare town to deliver 4,274 residential units. The Authority acknowledge the large quantity of permitted planning permissions (1,255 units), and also the requirement to allow for a quantum of headroom (50% of total requirement was used equating to a required new housing target of 1,794 units within the lifetime of the LAP). In this regard, the Authority supports the proposed use of phasing in the LAP to manage the future build out of residential development in Kildare town.

The Authority would suggest, given the level of uncertainty of existing residential permissions progressing to construction within the extant time period, and also the non-specific proposals put forward for the Magee Barracks site, that the phasing framework could be strengthened in the LAP. This could consider the total residential land bank within the LAP area, and using the sequential approach, set out a more detailed phasing strategy for the location of new housing in Kildare town, which could be implemented if the extant permissions lapse. This would be more in line with policy SS3 of the Kildare CDP, and Measure LU3 of the draft NTA Transport Strategy. The Authority also considers that a more clearly defined phasing strategy would make it easier for the Local Authority to comply with the proposed LAP policy PLD1.

Economic Development

The draft NTA Transport Strategy seeks to focus person-trip intensive development, particularly key destinations such as retail and office, into Dublin City and Large Growth Town centres within the GDA. Kildare town has been designated as a Moderate Growth Town in the RPGs, and as such the employment generated should be aimed at serving the local population. In this regard, the Authority has concerns over the potential impact of employment zoned lands to the west of Kildare town (referred to under objective EDO 2) which could become a trip intensive employment destination.

The site is adjacent to the M7 motorway interchange, providing easy access to the employment site by car from a national primary route. It is likely that an employment site such as that provided for in the LAP zoning objective could attract significant car based commuting trips from a wider catchment. This could potentially serve to undermine the strategic function of the M7 motorway as an inter-urban route, and could adversely impact on the capacity, efficiency and safety of the national road network.

The EDO 2 employment zoned lands are also located at a remove from the existing residential areas, the town centre and Kildare rail station, which will reduce the potential for trips to work by walking, cycling and public transport.

It is the view of the Authority that zoning objective EDO 2, by allowing for potentially trip intensive employment, goes against the policies set out DOECLG's 'Spatial Planning and National Roads Guidelines for Planning Authorities' document, as well as the policy objectives of Smarter Travel and the draft NTA Transport Strategy. The Authority suggests that the land use zoning at this location be modified to ensure that development is limited to less trip-intensive purposes.

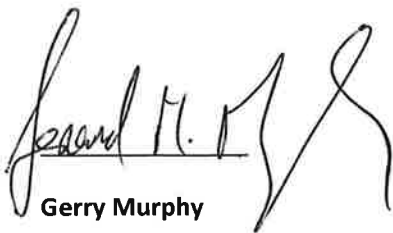
Movement and Transport

The Authority welcomes and supports the inclusion of pedestrian and cycle route objectives and traffic management objectives within the draft plan, which will assist in improving accessibility within Kildare town. To further strengthen these policies and objectives the Authority suggests that the LAP could make reference to, and in some cases incorporate measures set out in chapter 9 of the draft NTA Transport Strategy. Likewise the Authority suggests that the draft LAP could refer to guidance on cycle planning and provision as contained in the NTA National Cycle Manual (www.cyclemanual.ie).

The Authority has noted that a large number of proposed road schemes have been set out in the LAP, namely under section 7.7.2.3. The Authority would stress the need to assess each road proposal against the criteria set out in Measure ROAD 1 of the draft NTA Transport Strategy. Reference to this assessment process should be included in the LAP.

The Authority in conjunction with Kildare County Council has been working on a 5-year transport investment framework programme in the county. This investment programme (as part of the Sustainable Transport Measures Grants –STMG- funding programme) will aim to prioritise key transport investment proposals, including schemes for Kildare town. Reference to this programme should be included in the LAP.

I trust that the views of the Authority will be taken into consideration in the preparation of the draft Kildare town LAP.

A handwritten signature in black ink, appearing to read 'Gerry Murphy', written over a horizontal line.

Gerry Murphy

CEO