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

6th November 2012

**Re: Draft Kildare Town Local Area Plan**

Dear Sir/Madam,

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

The Authority acknowledges the consideration of its submission in the Manager’s Report on the Submissions/Observations on the Kildare Town Draft LAP.

**Reference to the Draft NTA Transport Strategy**

The Authority welcomes the inclusion, in the list of the proposed Material Amendments, a number of proposals which are related to the points raised by the Authority in its submission of 18<sup>th</sup> July. The Authority supports the insertion of the additional policy at Section 7.7.1: To have regard to Chapter 9 of the Draft National Transport Authority Strategy or as amended during the period of this plan regarding cycling and pedestrian measures in Kildare town.

**Residential Development**

In terms of residential development, the Material Amendments seek to propose a phasing strategy for the location of new housing in Kildare town, by amending Section 7.2.1. and re-stating policy HP2. It is noted by the Authority that a number of sites that are zoned C1 Phase 1 are located at a significant distance from the more central parts of the town or train station. This is not considered to be consistent with the sequential approach to the location of residential development in either the Kildare County Development Plan (as presented in Policy SS3) or the Draft NTA Transport Strategy (Measure LU3). One aspect of this is that this zoning approach prioritises extant permissions through their inclusion under the C1 lands, regardless of their location.

However, the Authority does support the inclusion, at Section 7.2.1., of the Planning Authority's intention to monitor residential development over the lifetime of the LAP in order to ensure compliance with the core strategy.

### **Employment Development**

The Manager's Report recommended that 40.8ha of lands zoned 'Industry and Warehousing' (zoned H1 and H2 on the Amendments Map) be downzoned to Agricultural use, and that 20.6ha of the adjoining Q1 and Q2 (Enterprise and Employment Lands) be changed to 'Industry and Warehousing' zoning. According to the Manager's Report, this would leave 7.1ha along the Nurney Road to be retained as Q1 'Enterprise and Employment' zoning. The Manager's Report states that these changes "are in light of the concerns of the NRA and the NTA". However, it is noted with regret by the Authority that neither of the recommended zoning changes are included in the Material Amendments Report discussed above. The Zoning Map remains unchanged for the area west of the town centre as far as the LAP boundary. The Authority would therefore reiterate its concerns in this regard.

The employment zoned lands Q1 and Q2 to the west of Kildare town, which are the subject of the Economic Development Objective EDO2, has the potential to become a trip-intensive employment destination, attracting significant car based commuting trips from a wider catchment, due to its location adjacent to the M7 motorway interchange. 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 NTA reiterates that 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 quantum and location of employment lands within the town should reflect this.

It also remains the view of the Authority that zoning objective EDO 2, by allowing for potentially trip intensive employment at lands zoned Q1 and Q2, would be inconsistent with the Draft Transport Strategy (Measure LU3).

As previously stated, the Authority cannot therefore, support the proposed land use zoning at this location, unless it is modified to ensure that development is limited to less trip-intensive purposes.

Yours Sincerely,



**Hugh Creegan**

Director of Transport Investment and Taxi Regulation,