

Senior Executive Officer,
Planning Department,
Kildare County Council,
Áras Chill Dara,
Devoy Park,
Naas,
Co. Kildare.

13th July 2016

Re: Draft Kildare County Council Development Plan 2017-2023.

Dear Sir/Madam,

The Authority welcomes the opportunity to comment on the draft Kildare County Council Development Plan 2017-2023.

Specifically, in relation to preparation of a development plan, Section 31(c) of the Planning and Development Act, 2000 states:

31C. — (1) Where a notice is received by the NTA under section 12(1) it shall, as part of any written submission on the draft development plan, state whether, in its view, the draft development plan is—

(a) consistent with its transport strategy, or

(b) not consistent with its transport strategy and in such case what amendments to the draft plan it considers necessary to achieve such consistency.

(2) The NTA shall send copies of a submission prepared under this section to the Minister and the Minister for Transport.]

General References to the Transport Strategy

The Authority's Transport Strategy for the Greater Dublin Area 2016 -2035 (hereafter referred to as the 'Transport Strategy') has recently been approved by the Minister for Transport, Tourism and Sport and now represents the principal policy context for transportation planning in the Greater Dublin Area (GDA). Any reference within the document to *draft* Transport Strategy, for example at Policy NR 1 and NR 3, should be replaced with Transport Strategy, in light of its approval by the Minister of Transport, Tourism and Sport.

Overview

In general, the Authority supports the policies and objectives set out in the draft Development Plan, which align with the principles of the Transport Strategy, and will ensure that growth in Kildare is planned in an integrated and sustainable manner. In particular the Authority welcomes the intention of the Development Plan to focus on directing population growth to the main urban centres with maximum growth focused on the Metropolitan towns of Maynooth, Celbridge, Leixlip and Kilcock, as it aligns with the settlement strategy of the Regional Planning Guidelines, and because the Strategy provides for the implementation of the DART Expansion Programme by 2035, whereby the core high capacity rail transit system for the region will serve Maynooth, Celbridge and Leixlip by rail. The Authority would, however, draw attention to the following issues, which should be addressed to ensure consistency between the Development Plan and the Transport Strategy.

Reference to 'National Transport Authority'

Under section 11 of the Dublin Transport Authority Act, 2008, a principal function of the Authority is to '*secure the provision of public transport infrastructure*'. In line with this function, it is the role of the Authority to develop and coordinate the implementation of new public transport infrastructure. In this regard, the Authority requests that any reference to the development of new, or modifications to existing, public transport infrastructure references the 'National Transport Authority' as the statutorily responsible body.

Recommendation:

To ensure that the Development Plan accurately represents the legislative role of the Authority, it is recommended that the draft Plan is reviewed and revised to ensure that the 'National Transport Authority' is identified as the body responsible for the provision of public transport infrastructure. In particular, the Authority draws attention to the objectives set out in Chapter 7 of the draft plan, specifically, MT6, MT9, PT1, and PTO6, which should reference the National Transport Authority.

Settlement Strategy Policies

The Settlement Strategy for the county is consistent with the principles for land use and transport integration that are set out in the Transport Strategy. However, it appears to the Authority that Policy SS 5 may facilitate departure from the Settlement Strategy, and suggests an amended wording for that Policy.

Recommendation:

The Planning Authority should consider amending the wording of Policy SS 5 as follows:

To provide that where infrastructural deficits within a particular growth area cannot be overcome within the period of this Plan, the growth anticipated for that development centre will be allocated to other serviced towns within that level or to serviced towns at a higher level of the Settlement Hierarchy. In considering the re-allocation of the growth for that development centre, the town(s) to which the growth is planned to be re-allocated must themselves be capable of accommodating that additional growth, with reference to such considerations as the planned public transport service capacity for that town that is set out in the Transport Strategy, and ensuring also that the town would not, as a result, grow to a scale that would be inconsistent with its position on the County's Settlement Type hierarchy.

Economic Development Strategy

The Authority notes that the planning authority intends to achieve a labour force to jobs (located within Kildare) ratio of 0.70. That would involve a significant increase in the number of jobs located within the county. The draft development plan states that the quantum of land zoned for employment uses also needs to increase in the areas identified as Primary Economic Growth Towns, due to a stated shortfall in lands zoned for that type of use. Additional zoning will be addressed in forthcoming LAPs for Maynooth, Celbridge, Leixlip and Naas.

While the proposal to provide employment at this scale is not inconsistent with the long-term Transport Strategy, it should be delivered in accordance with the suggested revised wording of Policy ECD3, below. The scale of employment development envisaged may be difficult to achieve taking into account North Kildare's position as an employment location within the GDA regional hierarchy.

Recommendation:

Policy ECD3 should be amended, with the following wording suggested for consideration:

To ensure that sufficient and suitable land is zoned for economic activity through the development plan and Local Area Plans, in accordance with the RPGs economic strategy (or the forthcoming Regional Spatial and Economic Strategy). The sequence of zoning of employment land uses and the delivery of services to those zoned lands shall be carefully phased, to be consistent with the Transport Strategy for the Greater Dublin Area 2016 -2035 and other statutory Regional Plans. Such land will normally be protected from inappropriate development that would prejudice its long term development for employment and economic activity.

Economic Development proximate to the National Road network

All of the locations identified as Primary Economic Growth Towns are served by the National Road network.

Recommendation:

The Economic Development Strategy needs to include further policies that state:

- that zoning for employment uses will be done in a manner which protects investment in the national road network, in accordance with Chapter 2 of the Department of Environment,

Community and Local Governments guidelines on 'Spatial Planning and National Roads', and seeks to prevent inappropriate levels of commuter traffic from using such routes in the County.

- that permission for any significant future employment developments in the vicinity of the strategic road network will be dependant of the ability to provide an appropriate level of non-car based transport options, utilising the strategic public transport network for the region that is outlined in the Transport Strategy for the Greater Dublin Area 2016 -2035.

Collinstown, Leixlip

The Authority acknowledges the intention, stated under Economic Development Strategy Objective EO4, to prepare a Local Area Plan for Collinstown, to guide the development of lands to be zoned for enterprise and employment uses. Given the potential quantum of zoned land, it is critical that phasing and delivery of land use is carefully planned, and linked to the build out of public transport.

Recommendation:

To ensure that the Kildare County Development Plan is consistent with the Transport Strategy, and that the development of Collinstown as an employment hub is planned in a phased, sustainable and managed way, the Authority recommends that additional text is included in Objective EO4 which states that the phasing and delivery of employment land uses are carefully planned, and linked to the delivery of enhanced public transport to this location, which will be co-ordinated by the National Transport Authority.

Movement and Transport

In relation to the Movement and Transport chapter of the draft Plan, the authority makes the following recommendation:

Recommendation:

Objective PTO4 should be omitted as it references the Quality Bus Network Office which no longer exists. Objective PTO5 should be omitted as the development of a public transport hub near Naas which would connect road, rail transport and public bus transport is not an objective of the Transport Strategy. Objective PTO 8 and PTO 9 should be omitted and a new objective inserted in relation to rail transport, as follows:

To promote and support the upgrading of infrastructure the Maynooth rail line and the Kildare rail line, in accordance with the Transport Strategy for the Greater Dublin Area 2016 -2035 and in co-operation with the National Transport Authority.

Road Network

It is critical that the capacity and efficiency of the existing strategic road network, including junctions, is preserved. The strategic road network is an integral part of the overall provision of transport within the GDA, and it is vital that capacity is reserved for strategic traffic movement, including freight movement. The Transport Strategy states that 'the strategic transport function of

national roads, including motorways, will be protected by the full implementation of the Department of Environment, Community and Local Governments (DoECLG) guidelines on 'Spatial Planning and National Roads- Guidelines for Planning Authorities'. The Authority recommends that Chapter 6 of the Development Plan incorporates this policy, and that any new development in the vicinity of the strategic road network shall be assessed in accordance with the policy and objectives set out in the DoECLG guidelines on 'Spatial Planning and National Roads'.

Recommendation:

To ensure that the Kildare County Development Plan is consistent with the Transport Strategy, and that the strategic road network is maintained, managed and operated appropriately, the Authority recommends that a policy is included in Chapter 6 of the Plan, stating the strategic transport function of national roads, including motorways, will be protected by the full implementation of the DoECLG guidelines on 'Spatial Planning and National Roads- Guidelines for Planning Authorities'.

Road Schemes

Proposals for road schemes need to adhere to the provisions of the Transport Strategy, which is specific in terms of the roads projects that are to be progressed in the GDA. In order to ensure consistency with the Transport Strategy, Policy RS6 should be amended. As a consequence, other subsequent policies will need to be amended also, as detailed below.

Recommendation:

Amend Policy RS6 as follows:

To secure the implementation of major road projects as identified within the Transport Strategy for the Greater Dublin Area 2016 -2035, with the identification of those road projects to be subject to assessment against the 'Principles of Road Development' criteria set out in Section 5.8.3 of the Transport Strategy for the Greater Dublin Area 2016 -2035:

- *That each proposed road scheme is consistent with the Transport Strategy for the Greater Dublin Area 2016 -2035 and with Government policies related to transport;*
- *That the travel demand or the development needs giving rise to the road proposal are in accordance with regional and national policies related to land use and development planning;*
- *That the development of the road scheme does not diminish in any significant way the expected beneficial outcomes of the Transport Strategy for the Greater Dublin Area 2016 -2035;*
- *That the road scheme, other than a motorway or an express road proposal, will be designed to provide safe and appropriate arrangements to facilitate walking, cycling and public transport provision; and*
- *That alternative solutions, such as public transport provision, traffic management or demand management measures, cannot effectively and satisfactorily address the particular circumstances prompting the road proposal or are not applicable or appropriate.*

Policy RS7 should be amended as follows:

To secure the implementation of major road projects that are consistent with the 'Principles of Road Development' criteria set out in Section 5.8.3 of the Transport Strategy for the Greater Dublin Area 2016 -2035, and are identified within this County Development Plan and Local Area Plans.

Objective RSO4 should be amended as follows:

To identify long term road corridors suitable for the development of high capacity roads within the developable area of towns and villages, that are consistent with the 'Principles of Road Development' criteria set out in Section 5.8.3 of the Transport Strategy for the Greater Dublin Area 2016 -2035, within the county and implement the short to medium term road improvement programme over the life of the County Development Plan.

Objective RSO 6 should be amended as follows:

To maintain corridors free from development to facilitate future roads and transport infrastructure improvement in order to facilitate the following road and bridge projects set out in Table 6.1, with the further progression of those roads projects subject to assessment against the 'Principles of Road Development' criteria set out in Section 5.8.3 of the Transport Strategy for the Greater Dublin Area 2016 -2035. Where the roads project is an orbital road around a town centre, its development needs to be accompanied by and facilitate enhanced public transport, cycling and pedestrian facilities in the relevant centre, as required by Section 5.8.2 of the Transport Strategy for the Greater Dublin Area 2016 -2035.

The Authority is prepared to assist Kildare County Council with any of the recommendations made in this submission and any other matters that we can be of assistance to the Council, in order to progress towards the adoption of the development plan.

I trust that the views of the Authority will be taken into consideration.

Yours sincerely,



Michael MacAree

Head of Integrated Planning