

Draft Clane Local Area Plan, C/O Senior Executive Officer, Planning Department, Kildare County Council, Áras Chill Dara, Devoy Park, Naas, Co. Kildare. Dún Scéine, Cúirt Uíbh Eachach, Lána Fhearchair, Baile Átha Cliath 2

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RE: Draft Clane Local Area Plan 2017-2023

Dear Sir / Madam,

The National Transport Authority (the "Authority") welcomes the opportunity to make a submission on the Draft Clane Local Area Plan 2017-2023.

Section 19 (2A) of the Planning and Development Act (as amended) states that each planning authority within the GDA shall ensure that its local area plans are consistent with the transport strategy of the NTA. The Transport Strategy for the Greater Dublin Area 2016-2035 was approved by the Minister for Transport, Tourism and Sport in early 2016. On review of the material published, the Authority makes a number of recommendations below which will ensure the consistency of the Clane Local Area Plan with the Transport Strategy:

### The Transport Strategy

The Authority notes that no reference is made to the draft plan's consistency with the Transport Strategy within the published document.

### Recommendation

An additional section setting out the plan's consistency with the Transport Strategy is recommended for inclusion in the Local Area Plan, in accordance with the legislation set out above. This should make reference to the land use principles contained within the strategy in addition to the relevant transport measures.

### 2. Permeability

The Authority welcomes the Strategic Objective of the Movement and Transport chapter. In general, the Authority would seek to provide for filtered permeability, whereby pedestrians, cyclists and, in some cases, public transport would benefit from dedicated linkages which are not available for use by the private car. In the case of Clane, however, the Authority is of the view that there is a case for

a limited number of new roads to access required residential development lands, and to allow for some through traffic and orbital traffic to avoid the town centre, if the capacity offered by such links is used to facilitate measures which reallocate roadspace in the retail core from car to other modes and for other purposes.

The Authority is of the view that once access by car into a residential cell has been provided, the principle of filtered permeability should be guiding the internal design of housing areas. Pedestrian and cycling links to and between existing housing estates should also be provided where practicable and where benefits can be identified. The manner in which the relevant objectives in the draft plan, in particular MTO1.4, are presented seems to equate filtered permeability with this latter category of links only.

#### Recommendations

Notwithstanding the proposed land use zonings, the Authority recommends that Policy MT5 is amended so as to include a commitment to protect new roads from inappropriate commercial development that would be more appropriately accommodated in the town centre, such as retailing and office.

Policy MT1 and its objectives should be clarified in order to state that the principle of filtered permeability applies to all housing areas and that the retro-fitting of pedestrian and cycle links into existing residential developments will be examined.

## Prosperous Road

In the Greater Dublin Area Cycle Network Plan, which forms part of the Transport Strategy, Prosperous Road is identified as a Primary / Secondary Cycle Route from the town centre westwards. Map 8.1 of the Draft Local Area Plan shows an objective for a new pedestrian / cycle path westbound from the GAA club only, with no scheme identified from the town centre to this point. The Authority is aware of the physical constraints that pertain on this section of the road which may mean that significant infrastructure is difficult to deliver, however the road remains part of the network and, as such, will require some physical intervention in order to make it more amenable to cycling. Measures aimed at reducing traffic levels and reducing traffic speeds reduction can still be accommodated at this point, particularly if some of the road schemes identified in the plan are realised.

#### Recommendation

It is recommended that the section of the Prosperous Road between the GAA club and the Town Centre is included as part of the Local Area Plan objective to deliver cycling infrastructure.

# 4. Strategic Road Connections

Section 8.5 refers to the consideration of a relief road for the town in the medium to long term including additional river crossings accommodating pedestrians. The Authority is fully cognisant of the constraints on the existing crossing of the River Liffey at Alexandra Bridge and would not be opposed to the provision of an alternative crossing if feasible. In relation to all road schemes, the Transport Strategy sets out a number of principles according to which road development in the GDA will be undertaken. Reference to these principles should be included in this section of the plan.

## Recommendation

It is recommended that a reference to the 'Principles of Road Development' as set out in section 5.8.3 of the Transport Strategy is included in the Movement and Transport chapter.

I trust that the views of the Authority will be taken into consideration by Kildare County Council in the finalisation of the Clane Local Area Plan.

Yours sincerely,

Michael MacAree

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Head of Planning and Data Analysis