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

6th March 2013

Re: Issues Paper for Local Area Plans for Clane, Sallins, Kilcock, Monasterevin, Kilcullen.

Dear Sir/ Madam,

The National Transport Authority ("the Authority") welcomes the opportunity to comment on the Issues Paper for the Local Area Plans (LAPs) for Clane, Sallins, Kilcock, Monasterevin and Kilcullen.

The Authority is currently preparing an Integrated Implementation Plan for Transport in the Greater Dublin Area (GDA) which, with respect to land use and transport integration, will be closely aligned to the policies set out in the Authority’s draft GDA Transport Strategy for the period 2011-2030. 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 policies, objectives and measures contained within the draft Transport Strategy in the preparation of its LAPs. The Authority therefore requests that the LAPs listed above are cognisant of the policies set out in the draft Transport Strategy, with particular regard to the points set out below.

The Regional Planning Guidelines (RPGs) for the GDA 2010-2022 defines a Settlement Strategy for the GDA. It divides the region between Metropolitan and Hinterland areas, and defines towns within each according to a settlement hierarchy. Kilcock is designated as a Moderate Sustainable Growth Town within the Metropolitan Area, while Monasterevin and Kilcullen are also defined as Moderate
Sustainable Growth Towns in the Hinterland area. Clane and Sallins are not defined in the settlement Hierarchy of the RPGs, but the RPG document states that all towns in the Hinterland are key destination points that form part of dynamic connections with the Metropolitan Area. Sallins performs that function through its rail station that links Naas and Dublin City. Although not located on a rail line, Clane is similar to all of the towns that are the subject of the LAP Issues Paper, in that it has a significant commuter function connected to the Metropolitan Area.

The Planning and Development (Amendment) Act 2010 provides that each planning authority shall ensure that its local area plans shall be consistent with the objectives of the development plan, its core strategy and the regional planning guidelines that apply to the area of the plan. In this regard, the Authority would recommend that the scale of employment and service provision (in particular shopping, education and leisure) facilities are commensurate with the settlement strategy and the Regional Planning Guidelines, as those documents apply to each of the five towns.

The position of each of the towns in the RPG Settlement Hierarchy is a recognition of their quality of accessibility by public transport and the linkages to the wider region that are provided by transport facilities at each town. Therefore, the Authority recommends that each LAP includes measures that will facilitate future investment in public transport and transport by sustainable modes.

The Issues Paper outlines that each town would benefit from further measures to improve the environment of pedestrian and cycle movement, in terms of the permeability and linkages provided, as well as enhancements to the safety of those modes. Each LAP should include objectives that detail the specific measures that the local authority seeks to deliver over the period of the LAP. The Authority suggests that the LAP should ensure that all relevant schemes that emerge from these objectives should be designed in accordance with NTA guidance.

The draft Transport Strategy outlines a number of specific infrastructural measures which will facilitate higher service levels and greater network accessibility, including the improvement of accessibility from Co. Kildare to the commercial and employment core of Dublin City Centre. Measures RAIL 3 and RAIL 4 are of particular relevance. Although it is recognised that, in the current economic climate, these enhancements may not be delivered in full during the period of the LAP, the Authority suggest that the LAPs for Sallins, Kilcock and Monasterevin in particular due to their position on rail corridors, should give particular consideration to the integration of land-use and transportation in the potential development of each plan area.
Measures LU1, LU2, LU3 and LU4 of the draft Transport Strategy outline the land use measures that should be considered when preparing the Local Area Plan. In particular, the LAP would be strengthened by taking account of the following principles/measures:

- A sequential approach to development, whereby, lands which are most accessible by public transport are prioritised for growth taking into account existing and partially completed developments and extant planning permissions. This point has particular application at Kilcock, where an over-supply of zoned residential land is acknowledged in the Issues Paper.
- Phasing of development to ensure that cycling and pedestrian infrastructure and public transport infrastructure/services are delivered simultaneously with the construction of new residential units, commercial development and community facilities;
- A strong focus on pedestrian and cycling movements for local trips, with all developments providing internal permeability for walking and cycling;
- Local services to be located and provided in a manner which ensures that access for the local community by walking and cycling is direct, safe and convenient;
- Severance within local catchments to be avoided to the extent practicable;
- A mix of dwelling types is provided to facilitate and encourage mixed residential communities to establish; and
- The redevelopment of brownfield (previously developed) sites close to existing or proposed public transport corridors.

The Authority works with Kildare County Council on an ongoing basis, in particular under the Sustainable Transport Measures Grants (STMG) funding programme. As part of this process, a rolling 5-year Investment Framework for Kildare has been prepared that serves as a guide to the allocation of funding for projects that improve the environment for pedestrian and cycle movement. The delivery of these schemes – or other possible schemes which may emerge over the lifetime of the framework – would be greatly assisted if each LAP gave them a statutory footing by making reference to the Authority’s Investment Framework for Kildare, in the LAPs Transport and Movement section. For example, the following statement could be included:

“To provide for public transport, walking and cycling infrastructure in collaboration with the National Transport Authority under the National Transport Authority’s funding programmes.”
I trust that the views of the Authority will be taken in to consideration. We look forward to working with Kildare County Council in the preparation of the LAPs for Clone, Sallins, Kilcock, Monasterevin and Kilcullen.

Yours sincerely,

Hugh Creegan
Director of Transport Investment and Taxi Regulation