

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



Dáta | Date
29 October, 2019

Ár dTag | Our Ref.
TII19-105917

Re: Proposed Material Alterations to the Draft Leixlip Local Area Plan, 2020 - 2026

Dear Sir/Madam,

TII acknowledges receipt of referral of the Proposed Material Alterations to the Draft Leixlip Local Area Plan, 2020 – 2026. The Authority welcomes the alterations proposed arising from consideration of the Authority’s initial submission on the Draft Plan. In relation to other proposed material alterations on display, TII outlines the following observations for the Councils consideration.

1. Development Lands

As outlined in TII’s initial submission on the Draft Local Area Plan, it is of particular importance that policies and objectives are drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland’s economic competitiveness by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

There is a critical need to manage national road assets in accordance with EU TEN-T Regulations, national, regional and local policy provisions and in accordance with the requirements of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).

The Draft Local Area Plan and proposed material alterations outline a number of significant development proposals for Leixlip which individually and cumulatively could have the potential to impact on the safe and efficient operation of the adjoining M4 strategic national road. It is important that policies and objectives are developed to ensure that such development can proceed complementary to safeguarding the safe and efficient operation of the national road network. The following comments address the specific locations identified;

a. Lands at Confey

In relation to development proposals for lands at Confey, it is noted that a number of proposed material alterations, individually and in combination, alter the processes proposed for the preparation of a future Masterplan for the lands concerned.

The alteration of the lands at Confey to Phase 2 lands by Proposed Material Alterations no. 5 and no. 8 is noted. Subjecting the lands to Transport Impact Assessment, informed by the ‘Area Based Transport Assessment’ Advice Note, TII/NTA (2018) included in Proposed Material Alteration no. 33 is welcome. The requirement for the lands to be subject to a Masterplan that will be integrated into the Leixlip Local Area Plan by way of a statutory

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amendment to the Local Area Plan included in Material Alteration no. 8 and no. 56 is also welcome as it provides opportunity for public and statutory consultation prior to incorporation into the Local Area Plan.

TII would welcome consultation on the Confey Masterplan when preparation commences and welcomes that the process includes for integrating the Masterplan into the Leixlip Local Area Plan by way of a statutory amendment.

b. Lands at Collinstown

Material Alteration no. 50 introduces the requirement for a Masterplan, developed in conjunction with relevant traffic/transport assessment, for lands at Collinstown. TII considers that similar to text included for Masterplan lands at Confey, the preparation of a Masterplan for the lands at Collinstown should also be prepared and integrated into the Leixlip Local Area Plan by way of a statutory amendment to the Local Area Plan, pursuant to Section 20 of the Planning and Development Act 2000 (as amended), in the interests of consistency.

TII would welcome the proposed material alteration to be amended, prior to adoption, to incorporate the requirement for the Mastepanning of lands at Collinstown to be prepared and integrated into the Leixlip Local Area Plan by way of a statutory amendment to the Local Area Plan.

TII would welcome consultation on the Collinstown Lands Masterplan when preparation commences and notes proposed alteration no. 29 includes the objective to consider the provision of a new railway station and strategic park and ride facilities on lands at Collinstown.

c. Lands at the Liffey Business Campus (the HP site)

TII notes and welcomes the provisions of proposed material alteration no. 18 which acknowledges the size and scale of the former HP Campus and outlines the requirement that planning applications for significant development on the site will be subject to Transport Impact Assessment. In that regard, proposed material alteration no. 33 outlining the requirement for TIA informed by the 'Area Based Transport Assessment' Advice Note, TII/NTA (2018) for the subject lands is also welcome.

It would be critical that the transport impact of development considers the cumulative impact of development of the subject lands and incorporates mitigation measures accordingly, including measures to reduce impact of development. In the opinion of TII, consideration of applications individually represents an inappropriate and piecemeal approach to development of this key employment area.

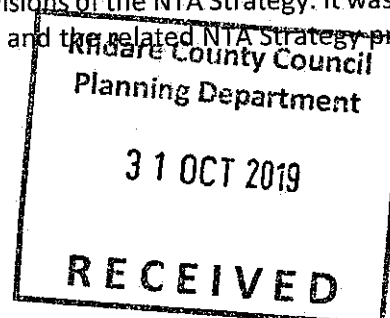
2. M50 Network Resilience

TII's initial submission on the Draft Local Area Plan outlined the proposal included in the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035, to 'Enhance orbital movement, outside of the M50 C-Ring, between the N3, the N4 and N7 national roads, by the widening of existing roads and the development of new road links'. Section 5.8.2 of the NTA Strategy refers.

TII prepared a technical report assessing M50 resilience between M50 J6 and J7. A variety of potential link routes have been identified that have the potential to act as a diversion route to the M50 and therefore enhance its resilience between M50 junction 6 and 7.

The potential routes identified are the alternative options available and a number of the options have tie-in locations at either M4 Junction 5 or Junction 6 and may necessitate additional river crossings.

It was requested that the Council gave consideration to the alternative potential routes identified when finalising the Local Area Plan and requested that provision was made within the text of the plan identifying the potential requirement for additional river crossings to give effect to the provisions of the NTA Strategy. It was also suggested that reference could be made to national road network resilience and the related NTA Strategy provisions within the text of the Local Area Plan prior to adoption.



TII indicated availability for consultation in relation to this matter.

With regard to the foregoing, TII notes the proposed inclusion of Proposed Material Alteration no. 39 and respectfully requests that the Council give special attention to the requirements for M50 network resilience and the provisions of the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035. TII recommends against adoption of Proposed Material Alteration no. 39 in its current form and remains available for consultation in relation to this matter.

In addition, TII recommends careful consideration is given to the variety and range of uses planned in the vicinity of proposed road schemes. The principles of Section 2.9 of the DoECLG Spatial Planning and National Roads Guidelines request that policies of planning authorities ensure that measures are put in place so that any adjacent development of sensitive uses are compatible with the construction and long-term operation of a proposed road scheme. In that regard, TII considers the proposed material alteration no. 42 concerning the development of a sensory garden within the grounds of St. Catherines Park should consider complementarity with any road scheme proposed in the vicinity.

3. Other Development Objectives

Section 8 of the Draft Local Area Plan included a number of specific transport related objectives with potential implications for the adjoining M4 and associated junctions;

- MT3.12 outlines the objective to investigate the feasibility of a new link road from the Celbridge Road (R404) to the south of the M4 connecting to the M4 Leixlip/Celbridge Interchange in consultation with TII, NTA and other stakeholders.
- MT3.13 outlines the objective to complete the through public road to connect the Celbridge Road (at former HP site) to M4 Interchange Junction 6 prior to the commencement of Celbridge Road East KDA.
- MT1.11 To support the delivery of a pedestrian and cycle overpass of the M4 to link The Wonderful Barn at Leixlip to Castletown Demesne in Celbridge in consultation with TII

As outlined in the Authority's submission on the Draft Kildare County Development Plan in relation to road projects that have potential implications for the national road network but are not schemes promoted by TII, the Authority acknowledges that it is beneficial to identify such schemes that are proposed to be delivered at a local/regional level within the term of the Plan. However, the Council should be aware that TII may not be responsible for financing such additional projects.

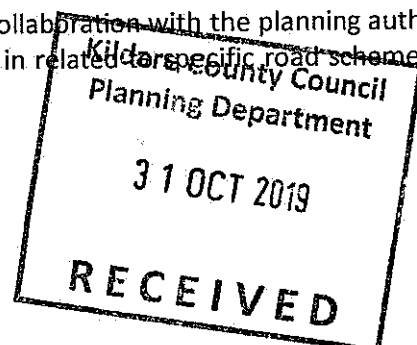
Such projects should be developed by the Council to complement the strategic function of the national road network and should not undermine or compromise this function. TII welcomes that the Draft Kildare County Development Plan included the provision that consultation with TII will occur and it is requested that this is also reflected in each of the relevant objectives of the Local Area Plan in the interests of consistency.

The principles outlined above would also apply to the identification of local Park and Ride facilities included in Proposed Material Alteration no. 30.

Projects identified should be progressed in accordance with the requirements of the DoECLG Spatial Planning and National Roads Guidelines (2012) where there may be implications for the operation of the national road network in the vicinity.

4. Future Consultation

As outlined in the foregoing, TII would welcome consultation and collaboration with the planning authority in the development of proposals relating to key development areas and in related ~~to~~ Kildare specific road schemes identified above.



In addition, the Draft Local Area Plan includes the objective to support the development of a North East Kildare Strategic Land Use and Transportation Study, TII would welcome consultation on this Study where there may be implications for the strategic national road network in the area.

Conclusion

It is requested that the foregoing comments and observations are taken into consideration prior to the adoption of the Leixlip Local Area Plan, 2020 – 2026.

Yours sincerely,



Michael McCormack
Senior Land Use Planner

