

2 Planning and Policy

2.1 Introduction

The proposed M7 Osberstown Interchange and the R407 Sallins Bypass have been identified as part of the transport planning strategy for County Kildare since the adoption of the Naas Town Development Plan in 2005. The proposed combined scheme, the M7 Osberstown Interchange and R407 Sallins Bypass Scheme which is the subject of this application, is compatible with the Government objectives in various policy documents, which can be grouped as follows:

- National Planning Policy Context.
- Transport Planning Policy Context.
- Regional Planning Policy Context.
- Local Planning Policy Context.

The proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme will form part of a regional integrated regional transport plan for Naas and its environs.

- While the proposed M7 Naas to Newbridge By-Pass Upgrade Scheme is to be constructed in advance of the M7 Osberstown Interchange and R407 Sallins Bypass Scheme, thereby providing relief to mainline M7 Naas Bypass traffic congestion and a replacement of the existing congested M7 Interchange at Newhall (Junction 10), the proposed M7 Osberstown Interchange is seen to provide further balance to traffic transferring between the Regional and National road networks. It will therefore reduce further the volumes of traffic at the ‘Maudlins’ (Junction 9) and proposed new ‘Newhall’ (Junction 10) M7 interchanges as well as the local and regional road network by providing additional connectivity between the local and regional network and the national road network.
- The proposed scheme will facilitate improved public transport services in the short to medium term through the reduction of traffic volumes on the local and regional road network, thereby improving journey-time reliability for local bus services connecting Naas to Sallins and the train station, and the north of the County along the R405 route, in accordance with the objectives of the Kildare County Development Plan 2011 to 2017.
- The proposed scheme will facilitate planned development of zoned land within the Naas Northwest Quadrant and will also provide connectivity to the Regional Road Network (R407 Sallins Bypass) to the north of the M7.
- In the longer term, the proposed scheme will assist in the achievement of the Sallins Local Area Plan 2009 objective for a Public Transport Interchange connecting regional bus services and the railway (the proposed Sallins / Regional Railway Interchange Station) should such development proceed

This chapter assesses the compatibility of the proposed scheme with the relevant National, Regional and Local Planning policies.

2.2 Background / Planning History

2.2.1 Millennium Park (Osberstown) Planning Scheme Ref. 99/500154:

Planning permission was granted by Naas Town Council on 25th February 2000, for the development of 110 hectares of industrial and warehousing uses. The proposal included a new interchange on the M7 motorway at Osberstown. A roundabout on the Sallins Road at the Monread Road junction and a new road network off this junction including a bridge crossing over the Naas and Corbally Branch of the Grand Canal between the former Odlum's Mills and the M7 Motorway was to be provided also. Much of this infrastructure work is now completed.

Condition 16 of the permission stated as follows-

“The developer shall design, prepare all necessary documentation for statutory approvals including where necessary C.P.O. and Motorway Scheme Orders and subsequently construct the proposed Interchange as soon as possible after granting of the relevant statutory approvals. The design and construction of the interchange shall be to the satisfaction of the Planning Authority and the NRA. The developer shall maintain and operate the interchange to the satisfaction of the Planning Authority and the NRA until it is taken in charge. All the above are in accordance with the commitment given in the applicant’s letter dated 17/12/99.

Reason: *To ensure proper development and to minimise traffic hazard. Failure to provide this interchange would result in recommendation for refusal of the application due to serious traffic hazard because the surrounding road system is deficient in alignment, capacity, structural strength and safety and would be unable to accept the additional traffic generated by the proposed development.”*

2.2.2 Kildare County Council M7 Osberstown Interchange Motorway Scheme 2008 Ref. PL09.HA0018.

On the 4th November 2008, Kildare County Council lodged an application with An Bord Pleanála, under sections 47 and 51 of the Roads Act, 1993 as amended, for approval of a motorway interchange consisting of a grade separated junction to the existing M7 motorway, and associated ancillary works, at Osberstown, Co. Kildare.

On the 26th February 2010, An Bord Pleanála refused to approve consent for this road scheme for the following reasons and considerations:

“REASONS AND CONSIDERATIONS

- 1. The environmental impact statement submitted by Kildare County Council in support of its application for approval of the M7 Osberstown Interchange Motorway Scheme contains many references to the interconnection between the proposed interchange and the proposed R407 Sallins By-pass, in particular,*
 - The transport objectives of the proposed interchange include:*

- *To provide relief to the existing congested M7 Motorway interchanges, at Newhall and Maudlins, by providing additional connectivity between the local and regional network and the national road network.*
- *To facilitate improved public transport services including a north/south public transport link across the M7 Motorway between Sallins and Naas in accordance with the objectives of the Kildare County Development Plan 2005-2011.*
- *The achievement of the Sallins Local Area Plan 2009 objective for a Public Transport Interchange connecting the M7 Motorway and the railway.*

- Planned future road infrastructure improvements which relate the proposed interchange to the proposed R407 Sallins By-pass as follows:

5.6.2 “The most significant planned road infrastructure improvement is the proposed R407 Sallins Bypass which is intended to connect to the M7 Osberstown Interchange. The proposed R407 Sallins By-pass is an objective of the Sallins Local Area Plan, as outlined in section 2.4.4 and is currently being brought through the planning process by Kildare County Council.”

- Improved public transport linkage which also relates the proposed interchange to the proposed R407 Sallins By-pass as follows:

3.2.2. “Provision of a direct connection from the proposed Regional R407 Route Sallins bypass to the M7 National Primary route via the new Motorway Interchange”.

It is further stated that the R407 Sallins By-pass scheme is currently going through the planning process and its connection to the proposed interchange at Osberstown forms a key part of the local authority’s transport plans for the region.

It is also stated that:

(a) the preferred design of a rotary interchange was influenced by the provision of a northern spur which it is stated “facilitates future connectivity with the proposed Sallins By-pass and public transport interchange” (Environmental Impact Statement, Page 22).

(b) the positioning of the interchange was determined, inter alia, by the “local road network including the proposed Sallins bypass” (Environmental Impact Statement, Page 19).

- 2. The Sallins Local Area Plan 2009 contains transportation objectives as follows:*

TR 4 (iv) To seek the construction of a new road from the Clane Road to the Naas Road (Sallins By Pass).

PT 5 To cooperate with, and support, public transport agencies and private stakeholders in developing a Public Transport Interchange, including the expansion of bus and train station facilities on lands adjacent to the Sallins Bypass route.

The Plan also identifies the preferred route of the R407 Sallins By-pass as linking directly to the proposed Osberstown Interchange.

3. *The Naas Town Development Plan 2005-2011 has a specific objective as follows:*

Section 4.2.7 Objective M25c states that “The Planning Authority will examine and assess the possibility/potential to provide a link road from the proposed Sallins By-pass to connect with the existing Road Network in Naas”.

Section 4.2.3 refers to a strategic transport corridor linking Sallins railway station south to Osberstown Millennium Park and to Naas Town Centre.

4. *The Board has been separately advised by the road authority that the emerging preferred route for the R407 Sallins By-pass connects to the proposed interchange.*
5. *In response to a request from the road authority on the 9th day of June 2009, An Bord Pleanála directed the road authority to prepare an environmental impact statement in respect of the R407 Sallins By-pass.*

It is clear from all of the foregoing, that in terms of road and transportation planning, there is a very strong connection between the motorway interchange and the R407 Sallins By-pass and the Board has come to the view that both projects should be considered together for the purposes of environmental impact assessment and that it would be premature to determine the instant applications in advance of, or separately from, the determination of the route and design of the R407 Sallins By-pass.

In deciding not to accept the Inspector’s recommendation to conditionally approve the application, the Board was of the view that the Inspector’s assessment did not give sufficient consideration to the relationship between the proposed interchange and the proposed R407 Sallins By-pass as expressed in the environmental impact statement and various statutory plans, and the Board could not accept the line of the R407 Sallins By-pass as having been determined separately from the proposed motorway interchange.

The Board, therefore, decided that the planning of the proposed interchange and of the R407 Sallins By-pass should be undertaken together in a comprehensive manner, even if the projects are to be implemented at different times in the future.”

The combined M7 Osberstown Interchange and R407 Sallins Bypass Scheme, which is the subject of this application to An Bord Pleanála, has directly addressed An Bord Pleanála’s reason for refusal above by appropriately and comprehensively considering the relationship between the proposed interchange and the proposed R407 Sallins Bypass, as expressed in this combined environmental impact statement.

2.2.3 Kildare County Council R407 Sallins Bypass Scheme 2008 Ref. PL09.HD0012

On the 1st December 2008 Kildare County Council sought a Direction from the Strategic Infrastructure Division of An Bord Pleanála (ABP), as to whether the proposed Sallins Bypass Regional Road required an Environmental Impact Statement (EIS). The southern end of the selected Bypass route was proposed to connect with the northern end of the proposed M7 motorway interchange at Osberstown.

On the 9th June 2009, as mentioned in ABP's reason for refusal above (ref. PL09.HA0018), ABP decided that an EIS was required in this proposal. The following reasons and considerations were given by ABP:

“Having considered the submissions made to it, the report and recommendation of the person assigned by the Board to make a report and recommendation on the matter, the guidance set out in the Third Schedule to the European Communities (Environmental Impact Assessment) (Amendment) Regulations 1999 and the document entitled ‘Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development’ issued by the Department of the Environment, Heritage and Local Government in August 2003, and having particular regard to the fact that the proposed road development would involve the construction of two number bridges over the River Liffey and one number bridge over the Grand Canal (a proposed Natural Heritage Area), it is considered that the proposed road development would be likely to have significant effects on the environment.”

The combined M7 Osberstown Interchange and R407 Sallins Bypass Scheme, which is the subject of this application to An Bord Pleanála, has directly addressed An Bord Pleanála's Direction above by appropriately and comprehensively considering this proposed scheme, which includes the relationship between the proposed M7 Osberstown Interchange and the proposed R407 Sallins Bypass, as expressed in this combined environmental impact statement.

2.3 National Planning Policy Context

2.3.1 National Spatial Strategy 2002-2020

The National Spatial Strategy (NSS), published in 2002, sets out a twenty year planning framework for Ireland which is designed to achieve a better balance of social, economic and physical development and population growth between regions.

In February of this year (2013), in an address to the Oireachtas committee on Jobs, Enterprise and Innovation, the Minister for Environment, Community and Local Government announced that the Government is to replace the NSS.

The Minister confirmed that the NSS will be replaced with new proposals which will be better resourced; however details of the replacement have not yet been published by the Government.

However, in the interim the NSS is still of relevance, especially when interpreting the policies and objectives of the Regional Planning Guidelines. In this regard Circular Letter PL. 2/2013 from the Department of Environment, Community and Local Government noted that:

‘Until such time as a successor to the NSS has been developed and adopted by Government (as the current NSS was) and Oireachtas (as per the Mahon recommendation), the existing NSS continues to serve as Ireland’s national level spatial planning framework.’

2.3.1.1 NSS and Sallins

The 2002 NSS outlines (at page 80) that:

“towns with a population of between 1,500 – 5000 in the Greater Dublin Area cater for local growth in residential, employment and service functions through enhancing the built environment, water services, public transport links and capacity for development in these centres. Accommodating such additional functions must however be balanced with protecting the character and quality of these towns”.

The 2011 Census, as carried out by the Central Statistics Office (CSO), has confirmed that the population for Sallins in 2011 is 5,283. This is a 38.8% increase on the 2006 Census population figure for Sallins of 3,806.

The NSS also states the following (at page 78) with regard to County Towns and Towns over 5,000 population that:

“the future roles of primary development centres such as these must take account of wider considerations, in addition to their relationship to Dublin. Issues that arise in this regard include the question of how such centres can energise their own catchments and their relationships with areas in the neighbouring regions of the Border, Midlands and South East.”

The proposed scheme seeks to eliminate congestion in Sallins town centre by removing the strategic traffic, particularly HGV traffic, from the town of Sallins. This will enable people to commute by walking and cycling as opposed to depending on vehicle transport. This will also result in lower collision rates thus generating a safer environment for cyclists and pedestrians.

In addition, if the County Council’s objectives to develop a regional transport hub which interconnects with rail and bus services (refer to the Sallins Local Area Plan 2009, Objectives PT5, PT7 and PT8 as well as to Kildare County Development Plan 2011-2017, Objective LT 3, below) the proposed scheme will assist in the achievement of this.

2.3.1.2 NSS and Naas

The CSO’s 2011 Census has confirmed that the population for Naas in 2011 is 20,713. This is a 3.3% increase on the 2006 Census population figure for Naas of 20,044.

A key goal of the NSS is the consolidation of Dublin. One of the proposed strategies for achieving this in Dublin's 'Hinterland' area includes the concentration of "development in strong towns with capacity for growth on well served public transport corridors" (p. 43).

Naas has been designated by the NSS as one of the Hinterland's primary growth towns and is also Kildare's County Town.

The NSS has designated Naas, as Kildare's largest town, along with the nearby towns of Newbridge and Kilcullen, as a 'Primary Development Centre' within the Greater Dublin Area. These areas need to aim at a population level that supports self-sustaining growth, but which does not undermine the promotion of critical mass in other regions.

The NSS states (at page 43) that the future role of towns such as Naas need:

"to take account not just of their relationship with Dublin, but also their function in the development and servicing of their own catchment areas and their relationship with other adjoining regions. Achieving the objectives of the NSS for balanced regional development means developing new gateways and hubs at strategic locations in other regions. This has implications for decisions on the ultimate size of towns in the Greater Dublin Area."

The designation of Naas, Newbridge and Kilcullen as a 'Primary Development Centre' has been further clarified under the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs). In general, the encouragement of self-sustaining growth in the Naas/ Newbridge/ Kilcullen cluster would help move the area's dependence away from journeys to Dublin for employment and assist in the planned development of the nation.

The key issues for Naas contained in the NSS are as follows:

- Designation of Naas as a Primary Development Centre (with Newbridge and Kilcullen).
- Promotion of self-sustaining growth and a move away from the dependence on Dublin (particularly for employment).
- Population growth of up to 50,000 persons for Naas Town (refer to 2010 RPGs).

The M7 Osberstown Interchange and R407 Sallins Bypass Scheme will provide the opportunity to improve connectivity between the motorway network and the large growth town of Naas, in particular the areas designated for economic development. This proposed scheme will also facilitate improved public transport links for the town of Naas and the linkage to the adjoining towns of Newbridge and Kilcullen in accordance with the RPGs.

The M7 Osberstown Interchange and R407 Sallins Bypass Scheme together with the Sallins Link Road will provide a convenient connection from the motorway network to the existing Sallins train station, and will encourage greater use of the existing 'park and ride' facilities.

The Scheme will also encourage greater pedestrian and cyclists linkages between Naas town and Sallins train station through reductions in traffic on the local road network, particularly along Sallins Road (Main Street) and Monread Road.

2.3.2 National Development Plan 2007-2013

The National Development Plan 2007-2013 (*'the NDP'*) provides support for the Government's Regional Development Strategic Policy Framework including proposals for capital expenditure on strategic infrastructure.

In November 2011 The Department of Public Expenditure & Reform published a revised capital programme *'Infrastructure and Capital Investment 2012 – 2016 Medium Term Exchequer Framework'*. The Capital Investment Programme seeks to address the changed fiscal and budgetary situation in the country resulting in reduced capital spending over the medium term. In this regard the 2011 Medium Term Exchequer Framework document has effectively superseded the 2007-2013 National Development Plan.

However, the NDP still has relevance as a guiding reference and it is noted in the 2011 Medium Term Exchequer Framework document that it is anticipated that there will be a return to a more substantial Public Capital Programme beyond the period of its review.

It is an objective of the NDP that Ireland's future spatial development is structured in a manner that is *"internationally competitive, socially cohesive and environmentally sustainable"*. The following investment in support of five key elements of the Government's regional policy framework will be made under this Plan (refer to page 62 of NDP):

(1) More efficient Greater Dublin Area (GDA): *supporting a strong and competitive GDA in order that it continues to drive its own development and that of the State through improved and more public transport based mobility, development of more compact and sustainable communities and high quality international and domestic transportation connections;*

(2) Strong Gateways in other Regions: *accelerating the development of strategically placed and national scale urban centres to act individually and collectively in delivering more spatially balanced patterns of economic development and population growth throughout their Regions;*

(3) Hubs: *linking and extending the capabilities and performance of the Gateways to more outlying and rural areas by supporting the accelerated development of key towns at strategic locations along the transport corridors between the Gateways;*

(4) County and other town structure: *capitalising on the important regional and local roles of Ireland's network of towns so that they can attract investment and act as engines of local growth within a wider revitalised and diversifying rural economy; and*

(5) Vibrant and diversified rural areas: sustaining the continuing process of growth and diversification in the rural economy through enhanced accessibility, communications infrastructure and activation of local development potential in areas such as local enterprise and services, tourism and the natural resource sectors.

These elements will promote the growth of Naas as Kildare's County Town and to serve as a strategic hub between the Gateways of Dublin and Cork / Limerick, as well as consolidating Sallins's local growth while protecting the character and quality of this town.

The ordered and sustainable growth of Naas will help deliver more spatially balanced patterns of economic development and population growth throughout the Greater Dublin Region. Additionally, Naas has attracted and hopes to attract further investment and act as an engine of local growth within the wider revitalised and diversifying rural economy.

The M7 Osberstown Interchange and R407 Sallins Bypass Scheme will be in line with all of the above elements for the following reasons:

- In conjunction with the proposed M7 Naas to Newbridge By-Pass Scheme, it will provide relief to existing motorway congestion in the vicinity of Naas, provide a more balanced distribution of traffic movements between the regional and national road networks on the M7 Naas By-Pass and provide a necessary connection from the motorway network to the existing and proposed employment areas in Naas and Sallins.
- It will provide a convenient connection to the existing Sallins train station, and will encourage greater use of the existing 'park and ride' facilities.
- By relieving congestion within the town of Sallins, the town will be more accessible and will offer the opportunity for an improved streetscape and encourage local growth.
- It will provide improved connectivity with other economic development areas in the county and the Greater Dublin Area, for example North East Kildare.

2.3.3 Infrastructure and Capital Investment 2012 – 2016 Medium Term Exchequer Framework

As noted above, the Department of Public Expenditure & Reform published a revised capital programme '*Infrastructure and Capital Investment 2012 – 2016 Medium Term Exchequer Framework*' in November 2011. The Capital Investment Programme seeks to address the changed fiscal and budgetary situation in the country.

This Framework document states (at page iii) that:

“Over the medium-term, there will be a lower level of resources available for capital investment. While not ideal, this is the reality of the fiscal challenge which the Government faces.

The potential negative consequences of reduced capital spending are tempered by recent improvements in the economy's infrastructure, but it is anticipated that there will be a return to a more substantial Public Capital Programme beyond the period of this review."

With regard to investment in the Road Network, the 2011 Framework Document states (at page 14) that:

"The key challenge in current circumstances is to ensure adequate maintenance of the National Road Network in order to protect the value of previous investments and to target the improvement of specific road segments where there is a clear economic justification. The focus of the Exchequer funding to be made available to 2016 will be on pursuing these objectives."

The Framework Document also states (at page 15) with regard to the Road Network that:

"Should investment prospects pick up over the medium-term, there are further road projects which can serve to enhance competitiveness and improve enterprise conditions and which will be progressed by the NRA in the event of additional resources becoming available."

With regard to investment in Public Transport, the 2011 Framework document states (at page 16) that:

"Public Transport is afforded high priority in the Programme for Government. This is due to the contribution that an attractive public transport system can make not only to economic renewal and to the climate change agenda but importantly also to the citizen's daily lives. Investment in public transport facilitates alternatives to car transport, helping to reduce congestion and emissions and enabling the transport sector to cater for the demands associated with longer term population and employment growth in a sustainable manner."

The Framework Document also states with regard to Public Transport (at page 16) that:

"While recognising the impact of the current difficulties, the aim under this framework is to ensure that spending over the next five years is coherent and consistent with the various transport and planning strategies which have evolved over the past decade. The main focus is on protecting and extracting maximum value from existing assets. It is also proposed - where possible - to provide a platform from which to build a better, more integrated, public transport network when the economy improves."

Making public transport more attractive requires on-going funding to maintain existing infrastructure safely, remove bottlenecks and pinch points, provide better passenger information and provide for limited and targeted improvements. This approach can reduce operating costs and enhance patronage and revenue."

The M7 Osberstown Interchange and R407 Sallins Bypass Scheme together with the Sallins Link Road will help protect the value of previous investments (in the M7 motorway) by relieving existing motorway congestion in the vicinity of Naas and providing a necessary connection from the motorway network to the existing and proposed employment areas in Naas and Sallins. The proposed scheme will also enhance access to existing public transport infrastructure by providing a convenient connection from the motorway network to the existing Sallins train station, and will encourage greater use of the existing 'park and ride' facilities.

2.3.4 Programme for Government 2011

The Programme for Government 2011 sets out the broad policy areas of the current Irish Government for the five year period 2011-2016, and is wide ranging in application. The Programme contains proposals for more effective scrutiny and transparency of the financial and fiscal processes of Government. In terms of investment the programme states that priorities will include investment in school building, non-national roads, healthcare, and in job-creation. However, there is also recognition of the need to rebalance transport policy in particular regarding public transport. There is continued commitment to invest in the National Cycle Policy and a focus on integrating cycle schemes more effectively with public transport links.

The proposed scheme will fulfil the intent of the programme in that it will enable people to commute by walking and cycling as opposed to depending on vehicle transport by removing the strategic traffic from the town of Sallins and along specific sections of the local road network in Naas, thus generating a safer environment for cyclists and pedestrians.

2.4 Transport Planning Policy Context

2.4.1 Smarter Travel - A New Transport Policy for Ireland 2009 – 2020 (2009)

In February 2009, the document Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020 was published by the Department of Transport to set out the vision of a sustainable transport future in 2020. This policy document proposes the provision of an alternative to the existing trends which include increased traffic congestion resulting in a loss in economic competitiveness. It therefore sets out measures seeking to have thousands more people walking, cycling, using public transport and leaving their cars at home by 2020. With this action plan the Government aims to change the transport mix in Ireland so that by 2020 the car-based share of total commutes to work will drop from the current 65% to 45%.

The fundamental objective underpinning this policy document is the provision of a high quality, integrated and sustainable travel and transport infrastructure that supports the movement of goods and people, which will ensure continued Irish competitiveness. This translates into the goals, actions and objectives of the document which seeks to ensure that there are multi-modal facilities and alternatives available which will negate the current trends of increased traffic congestion.

This will involve new ways of approaching many aspects of policy making in Ireland. It affects how we plan our schools and school curricula, influences where we develop residential areas and centres of employment in the future, opens up social and employment opportunities for people who experience reduced mobility and returns urban spaces to people rather than cars.

The 49 actions in the “*Smarter Travel*” Transport Policy document can be grouped under four key headings (refer to page 29 of the document):

- *Actions to reduce distance travelled by private car and encourage smarter travel, including focusing population growth in areas of employment and to encourage people to live in close proximity to places of employment and the use of pricing mechanisms or fiscal measures to encourage behavioural change;*
- *Actions aimed at ensuring that alternatives to the car are more widely available, mainly through a radically improved and more accessible public transport service and through investment in cycling and walking;*
- *Actions aimed at improving the fuel efficiency of motorised transport through improved fleet structure, energy efficient driving, and alternative technologies; and*
- *Actions aimed at strengthening institutional arrangements to deliver the targets.*

This document sets out a number of key goals for the achievement of the Government’s vision for 2020 (refer to page 27 of the document) including:

- *improve economic competitiveness through maximizing the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.*
- *minimize the negative impacts of transport on the local and global environment through reducing localized air pollutants and greenhouse gas emissions.*
- *reduce overall travel demand and commuting distances travelled by private car.*

Chapter 5 of the document highlights that there is a realization that roads will continue to be the main source of transport for people and goods without such alternatives and as such there is a need for integrated measures. Action 22 seeks to “*fast track the establishment of park and ride facilities along major public transport nodes, at the periphery of major urban areas and at key public transport locations and nodes*” (page 46).

In addition there is a focus on the need to improve the efficiency of motorized means of transport with a view to “*limiting the development of traffic jams with their associated negative consequences for fuel consumption and emissions*” (page 51).

There is also recognition that the “*efficient movement of goods is vital to our competitiveness and economic welfare*” (page 36). Transport by roads is vital to the efficient movement of goods and people. Therefore continued investment in roads will remain an important element of sustainable travel to 2020 while relieving congestion problems.

- Environment theme.

A number of fundamental tenets underlie the NTA's draft strategy objectives. These include the adoption of a hierarchy of transport users with pedestrians, cyclists and public transport users at the top of the hierarchy. Consequently these users should have their safety and convenience needs considered first. A second key principle is the requirement that land use planning and transport planning need to be considered together in the overall development of the GDA region.

The document addresses maximising the benefits of public transport through the integration of public transport interchange facilities, both local and strategic, into the overall development of central areas. The following objectives in particular are relevant to the proposed development (please refer to page 25 of Chapter 10 of the Strategic Transport Plan):

“Measure INT 5 - The Authority will:

- *Seek the provision of larger Strategic rail based Park and Ride facilities at appropriate points where rail services intersect with National Primary roads outside the M50, with a phased approach to parking provision at each site and monitoring to ensure unintended consequences such as significant additional congestion or car travel do not arise, before further expansion is considered;*
- *Seek the provision of local Park and Ride schemes in outer parts of the metropolitan area and in the Hinterland area, where they improve public transport accessibility without worsening road congestion, or increasing car travel distance.”*

The proposed Scheme is compatible with these objectives as it will assist in the achievement of the Sallins Local Area Plan 2009 objective for a Public Transport Interchange connecting regional bus services and the railway (the proposed Sallins / Regional Railway Interchange Station) should such development proceed.

2.4.3 Consultation Draft National Transport Authority Integrated Implementation Plan for the Greater Dublin Area 2013-2018 (2013)

The National Transport Authority (NTA) has prepared a Consultation Draft Integrated Implementation Plan 2013 – 2018 for the Greater Dublin Area (GDA). This consultation document outlines proposals for the Greater Dublin Area in the areas of infrastructure investment, integration of public transport, integrated service, and other matters.

The general objectives of the integrated implementation plan have been categorised by the Consultation Draft document under economic, social and environmental headings as follows (refer to page 17 of the Consultation Draft Implementation Plan).

Economic Objectives

- Improve travel time and reliability for the movement of people and goods.

- Facilitate businesses by the efficient movement of people in the region seeking employment opportunities.
- Support businesses through the facilitation of the efficient distribution of goods and materials and servicing of premises.
- Appropriately allocate financial resources to achieve economically efficient sustainable transport solutions.
- Improve access to key regional destinations, such as the ports, Dublin Airport, hospitals and colleges.

Social Objectives

- Enhance accessibility to jobs, schools, shops, local services, leisure facilities and other destinations.
- Enable access across the region to large educational institutions, in particular third level colleges.
- Improve access for all people, including physical access for mobility impaired people.
- Improve internal connections between communities and external links to/from areas outside the GDA.
- Provide for an improved quality of public realm for the movement of people.
- Improve the quality of travel information and access to this information.
- Advance the user-friendliness of the public transport system including easy transfer across the various modes and operators.
- Improve personal security and more comfortable travel experience.

Environmental Objectives

- Reduce the impact of transport on air and water quality.
- Reduce transport related greenhouse gas emissions.
- Reduce the impact of noise and vibration.
- Promote energy efficiency and focus on reducing dependence on non-renewable resources.
- Reduce impact on biodiversity and natural amenities.

Key Principles for the Integration of Land Use and Transport

In order to give clarity to those principles underpinning the integration of land use and transport, the Consultation Draft Integrated Implementation Plan has split these principles into two groupings:

- Those which apply at trip destinations, e.g. workplaces, schools, retail.
- Those which apply at trip origins, i.e. residential areas.

In particular, the key trip destination-focussed principles related to optimising the integration of land use and transport provision include the following (refer to page 55 of the Consultation Draft Integrated Implementation Plan):

- High volume, trip intensive developments, such as offices and retail, should primarily be focussed into Dublin City Centre and the larger Regional Planning Guidelines (RPG) higher order centres within the GDA.
- The role and function of district centres and neighbourhood centres should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling at these locations. This relates to providing for an appropriate scale of development in these centres which would not undermine development potential in Dublin City Centre or the larger RPG higher order centres.
- Except in limited circumstances such as where specific physical requirements exist for the siting and operation of a particular land use, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high quality public transport.
- The strategic transport function of national roads, including motorways, should be maintained by limiting the extent of development that would give rise to the generation of local car-based traffic on the national road network. This principle also applies to trip origins such as residential development.
- All non-residential development proposals in the GDA should be subject to maximum parking standards. These should be set by the local authorities in the GDA in consultation with the Authority and should vary spatially on the basis of centrality and the level of public transport provision.
- In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied.
- For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing guidance.

The proposed scheme is compatible with these objectives as it will assist in the achievement of the Sallins Local Area Plan 2009 objective for a Public Transport Interchange connecting regional bus services and the railway (the proposed Sallins / Regional Railway Interchange Station) should such development proceed. If the proposed Sallins / Regional Railway Interchange Station proceed, it will help to maximise connectivity by rail between the main centres of economic activity in the GDA (such as Naas) and Dublin City Centre.

2.4.4 National Cycle Policy (2009)

Ireland's first National Cycle Policy Framework (NCP) was launched by the Department of Transport in April 2009 as part of their '*Smarter Travel*' initiative. It outlines 19 specific objectives, and details the 109 individual but integrated actions, aimed at ensuring that a cycling culture is developed in Ireland to the extent that, by 2020, 10% of all journeys will be by bike.

The overall vision of the policy is:

“to create a strong cycling culture in Ireland. The vision is that all cities, towns, villages and rural areas will be bicycle friendly. Cycling will be a normal way to get about, especially for short trips. Cycling contributes to improved quality of life and quality of the public realm, a stronger economy and business environment, and an enhanced environment. A culture of cycling will have developed in Ireland to the extent that 10% of all trips will be by bike by 2020” (refer to page 6 of the NCP).

Specifically, objective 2 of the National Cycle Policy is to:

“Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly and that traffic management measures are also cyclist friendly” (refer to page 18 of the NCP).

In order to achieve this objective, it is an action to develop cycle-networks as part of wider cyclist-friendly local traffic plans / traffic management plans in all urban areas.

The proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme will facilitate pedestrians and cyclists with a shared footway and two-way cycle track facility on the eastern side of the bypass from the northern terminus south as far as the railway line whereupon pedestrians and cyclists will be able to connect to the local road network, providing access to the Grand Canal, Sallins town and Naas town. The Sallins Link Road will facilitate pedestrians and cyclists with footways and one-way cycle tracks provided along both sides of the carriageway.

A dedicated cycle connection is also proposed which will connect the Canal Road to the Western Distributor Road, where full cycle and pedestrian facilities are provided. This will facilitate a cycle friendly route/connection between the proposed R407 Sallins Bypass and the employment area in Millennium Park without the need to negotiate the proposed M7 Osberstown Interchange.

Specifically, the proposed scheme will support Kildare County Council and NTA objectives to develop an integrated cycle network for Naas and environs, through the removal of traffic on local road network sections identified and cycle routes, such as the Sallins Road and Monread Road. In addition, the proposed scheme will enable people to commute by walking and cycling as opposed to depending on vehicle transport by removing the strategic traffic from the town of Sallins, thus generating a safer environment for cycling and pedestrians.

2.4.5 Department of Transport – Statement of Strategy (2011 to 2014) (2011)

The Strategy is a high-level document which focuses on the Department of Transport’s highest priority transport objectives as agreed with the other Government Departments.

The high level goal for (land) transport is:

“to provide for the maintenance and upgrade of the transport network and ensure the delivery of public transport services with particular regard to

economic competitiveness, social needs, sustainability and safety objectives” (refer to page 3 of Statement).

The strategy outlines that transport infrastructure is important to the country’s economic recovery and states that the Department:

“must seek, where possible to deliver network improvements in support of competitiveness and economic recovery” (refer to page 4 of Statement).

Some of the key focus areas will include:

- *Maintain road and public transport infrastructure and implement improvements where funding is available.*
- *Encourage more people out of their cars by improving their experience of public transport, safe cycling and attractive walking.*
- *Maintain the downward trend in road fatalities and injuries.*

The proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme will support these focus areas by either removing through traffic or efficiently transferring regional and local traffic from the towns of Naas and Sallins to the proposed road development. The reduced through-traffic in these towns will facilitate the improvement of the streetscapes in these towns thus generating a safer environment for cyclists and pedestrians to enable workers/school children to commute by walking and cycling.

In particular, pedestrians and cyclists will be facilitated with a shared footway and two-way cycle track facility on the eastern side of the bypass as far as the railway line whereupon pedestrians and cyclists will be able to connect to the local road network, providing access to the Grand Canal, Sallins town and Naas town. Sallins Link Road will facilitate pedestrians and cyclists with footways and one-way cycle tracks provided along both sides of the carriageway.

2.4.6 Iarnród Éireann 2030 Rail Network Strategy Review (2011)

Iarnród Éireann published their 2030 Rail Network Strategy Review in October 2011. The focus of this 2030 Rail Network Strategy Review is on the future development requirements of the Iarnród Éireann InterCity Network (ICN) and the regional services.

The major tasks envisaged for the Review included:

- *A passenger demand assessment on a ‘route by route’ basis for the network.*
- *An assessment of rail freight potential including the role of freight facility grants.*
- *Assessment of new business opportunities including the reinstatement of services on disused lines.*
- *Identification of investment needs.*
- *Economic justification of investment on a major project basis and / or on a ‘route by route’ basis.*
- *Review of wider economic benefits associated with the rail network.*

- *Financial assessment of emerging proposals including impact on subvention levels.*
- *Prioritisation of investment, ranked within a range of funding limits and economic return indicators in line with Department of Transport appraisal guidelines.*
- *Establishment of a development vision for the railway for the year 2030.*
- *Production of an appropriate demand assessment model and final report within the agreed timescale.* (Refer to page 1 of Strategy document).

The review also notes (at page 9) that at a local level, county development plans take account of the need to develop services and infrastructure to enhance commuter services and drive modal shift from private cars. An example of this is the provision of ‘*park-and-ride*’ facilities at rail stations along key commuter routes and the addition of feeder bus services to link local areas to key points on the rail network.

The M7 Osberstown Interchange and R407 Sallins Bypass Scheme will provide a convenient connection from the motorway network to the existing Sallins Train Station, and will encourage greater use of the existing ‘*park and ride*’ facilities.

The need for such services and infrastructure is also reinforced in national transport policy in ‘*Smarter Travel – A Sustainable Transport Future*’ (see section 2.4.1 above).

In addition, in the longer term, the proposed scheme will assist in the achievement of the Sallins Local Area Plan 2009 objective for a Public Transport Interchange connecting regional bus services and the railway (the proposed Sallins / Regional Railway Interchange Station) should such development proceed.

2.4.7 Spatial Planning and National Roads Guidelines for Planning Authorities (2012)

The Department of the Environment, Community and Local Government, in association with the Department of Transport, Tourism and Sport, published these guidelines in January 2012. The purpose of the guidelines is to set out planning policy considerations relating to development affecting national roads (including motorways, national primary and national secondary roads) outside the 50/60 kmh speed limit zones for cities, towns and villages. These guidelines have been developed by following a number of key principles and aim to facilitate a well-informed, integrated and consistent approach that affords maximum support for the goal of achieving and maintaining a safe and efficient network of national roads in the broader context of sustainable development strategies, thereby facilitating continued economic growth and development throughout the country.

The guidelines recognize that national roads play a key role within Ireland’s overall transport system and in the country’s economic, social and physical development. The primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports, and to provide access between all regions.

The guidelines note that the planning system must ensure that the strategic traffic function of national roads is maintained by limiting the extent of development that would give rise to the generation of short trip traffic on national roads or alternatively by ensuring that the trip demand from future development will primarily be catered for on the non-national network.

In particular, with regard to development at national road interchanges of junctions, the guidelines state the following at Section 2.7:

Interchanges/junctions are especially important elements of national roads infrastructure that development plans and local area plans must take account of and carefully manage.

The location and capacity of interchanges/junctions on national roads are determined during the road planning process, in consultation with local authorities, taking account of a range of factors including anticipated inter-urban and interregional traffic volumes over a design horizon of at least 20 years. A key objective of the approach to road planning is to achieve a satisfactory level of service for road users and to protect and maintain that service over the design period applying to the mainline road and associated interchanges.

Therefore, planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. They must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

However, in certain circumstances, additional junctions, or enhancements to existing junctions on national roads, may become necessary to service development needs of national and strategic importance or in cases where a proposed development is demonstrated by the planning authority to be more appropriately located proximate to such junctions. In such circumstances, the NRA will support such capacity enhancements and development proposals where all of the following criteria are met:

- *Demonstration of the need for additional connectivity by reference to policy considerations such as the National Spatial Strategy, Regional Planning Guidelines and in the Greater Dublin Area, the National Transport Authority's transport strategy.*
- *Consistency between the relevant development plan and the relevant plans and strategies mentioned above;*

- *Early identification, through the plan-making process, of appropriate strategic land uses, which will benefit from high quality access, such as nationally or regionally important employment clusters or intermodal transfer facilities (but excluding retail and residential development); Demonstration that all other options for servicing the development needs and, in particular, the regional and local roads network and the use of public transport solutions, have been examined and exploited to the fullest extent practicable;*
- *Demonstration that the additional traffic loading can be satisfactorily accommodated at the junction concerned and on the national road network;*
- *Ensuring that the proposed development will not give rise to an undesirable precedent for further traffic generating development at or in the vicinity of the proposed development;*
- *Demonstration that design complies with NRA Design Manual for Roads and Bridges (DMRB) standards;*
- *Satisfactory details of the proposed demand management measures; and*
- *Acceptable funding and delivery proposals for any required improvements.*

The proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme will meet these criteria as the proposed scheme will

- encourage the concentration of growth in the designated large growth town of Naas and will increase and improve connectivity between this designated town (including areas strategically designated for economic development) and national transport routes (including orbital as well as radial routes).
- facilitate improved public transport links for the town of Naas to the Sallins Station and the linkage onwards to the adjoining towns of Newbridge and Kilcullen in accordance with the recommendations of the RPGs.
- support the designation of Naas as a Primary Development Centre, having regard to the objectives of the National Spatial Strategy, with self-sustaining growth and a move away from the dependence on Dublin, particularly for employment, with the facilitate improved public transport links for the town of Naas, the greater use of the existing ‘park and ride’ facilities at Sallins and the proposed connection of areas designated for economic development to the motorway.
- promote the ordered and sustainable growth of Naas, will promote the consolidation of Sallins’s local growth and will help deliver more spatially balanced patterns of economic development and population growth throughout the Greater Dublin Region, having regard to the National Development Plan.
- promote more public transport based mobility (including use of the Sallins park and ride facility) and will relieve existing motorway congestion in the vicinity of Naas as well as non-local traffic congestion in Sallins.

- alleviate traffic congestion at the existing Newhall and Maudlins interchanges, in conjunction with the proposed M7 Naas to Newbridge Bypass Scheme, and will additionally provide an improved link to an enhanced Sallins Train Station from the M7, from Naas, and in particular from Naas's Northwest Quadrant, having regard to 'Smarter Travel', the New Transport Policy for Ireland (2009), this proposal. This will make it more attractive to use public transport and encourage a modal shift away from private transport.
- facilitate an improved link to an enhanced Sallins Train Station from the M7, from Naas, and in particular from Naas' Northwest Quadrant, which, will make it more attractive to use public transport and encourage a modal shift away from private transport, having regard to the NTA's 'Greater Dublin Area Draft Transport Strategy for 2011-2030 (2030 Vision)' this proposal.
- facilitate pedestrians and cyclists with shared footpaths and cycle track facilities connecting to the local road network. In addition, the proposed scheme will enable people to commute by walking and cycling as opposed to depending on vehicle transport by removing the strategic traffic from the town of Sallins, thus generating a safer environment for cyclists and pedestrians, having regard to the National Cycle Policy (2009).
- be a key component for the continued development of the region and is required to reduce traffic congestion in Naas and Sallins, while also providing a high quality access to Sallins Train Station (and park and ride facility) from the M7 Motorway Corridor, having regard to the specific objective in the Kildare County Development Plan 2011 to 2017 (Objective RP2) to provide this proposed development.
- facilitate the link between Sallins Train Station, via the proposed R407 Sallins bypass south to Osberstown/ Millennium Park and Naas Town Centre with the associated relief of traffic congestion, having regard to the regard to the specific objective in the Naas Town Development Plan 2011 to 2017 (Objective RP06) to provide this proposed development.
- link into the proposed R407 Sallins Bypass which would assist RPG objectives to facilitate accessibility/connectivity from designated growth towns to National Transport networks via main radial/ orbital intersections and to high quality rail services, as well as relieving traffic congestion, having regard to the specific objectives in the Sallins Local Area Plan 2009 (Objectives TR3 (iv) and TR3 (v)) to provide this proposed development.
- remove through traffic and efficiently transfer regional and local traffic from the towns of Naas and Sallins to the proposed road development
- assist in the achievement of the Sallins Local Area Plan 2009 objective for a Public Transport Interchange connecting regional bus services and the railway (the proposed Sallins / Regional Railway Interchange Station) should such development proceed.

The RPGs outline at page 17 that the future role of towns such as Naas need to take account:

“not just of their relationship with Dublin, but also their function in the development and servicing of their own catchment areas and their relationship with other adjoining regions”.

The RPGs state at page 72 that:

“Locational advantages of the Naas/Newbridge Core Economic Area include its location on a multi modal corridor including the N7/M7 and rail service from Dublin to Galway (with a commuter train service to Dublin from Sallins)”.

The RPGs state at page 94 that Large Growth Towns, such as Naas,

“Located both within and outside of the Metropolitan Area are, in addition to the Gateway [of Dublin City], critical to the success of the RPGs. They will accommodate significant new investment in transport, in economic and commercial activity and in housing. These towns act as important self-sustaining regional economic drivers for the GDA, capitalising on their international connectivity and high quality connections to Dublin City Centre, whilst also supporting and servicing a wider local economy, and for some this extends beyond the GDA into surrounding Regions.

They are important centres for delivery of public services, with hospitals, Courts, Local Authority and Civil Service offices located within the town; alongside IDA promoted companies, high order retail businesses, supported enterprise centres and active Chambers of Commerce providing a strong commercial hub within the town and environs.”

The RPGs state at page 92 that the:

“continued promotion and successful development of improved or new public transport links from Large Growth towns shall be supported by achieving economies of scale through focused development of these towns economically and demographically. Where towns are proximate and/or form part of a cluster, the linkages between such towns should be improved to support economic activity and expand the labour market available to industry and commerce in these towns.”

Having regard to County Kildare in particular, the RPGs state at page 98 that:

“the continuing support of growth within Naas-Newbridge is the key driver for the South Kildare area associated with the promotion of the towns as employment centres and building good public transport connections to the rail line”.

The RPGs outline at page 117 that while:

“investment in public transport development is the main priority in the GDA, it is recognised that future transport demands cannot be delivered solely by the public transport rail system, and that the road network will continue to be critical to transport management and the efficient movement of buses, people, goods and other services in the GDA and beyond”.

The RPGs state at page 118 that:

“Regional roads and local roads are also important for the GDA, serving local enterprise, tourism, agriculture and providing essential access for communities to core services and goods. Policies for sustainable investment in upgrading the existing local road network and improving safety for vehicles, cyclists and pedestrians are strongly supported”.

The RPGs states at page 117 that:

“Development of a limited number of key nodes along a strategic corridor may be appropriate at some locations within and abutting key growth towns and development areas in the RPG hierarchy and which are consistent with national and regional development and the RPG economic and settlement strategy”.

The RPGs outline at page 72 the locational advantages of the Naas/Newbridge Core Economic Area which include:

“Its location on a multi modal corridor including the N7/M7 and rail service from Dublin to Galway (with a commuter train service to Dublin from Sallins)”.

The M7 Osberstown Interchange and R407 Sallins Bypass Scheme will provide the opportunity improve connectivity between the motorway network and the large growth town of Naas, in particular the areas designated for economic development. This Scheme will also facilitate improved public transport links for the town of Naas to the Sallins Train Station and the linkage onwards to the adjoining towns of Newbridge and Kilcullen in accordance with the recommendations of the RPGs.

2.6 Local Planning Policy Context

2.6.1 Naas Integrated Framework Plan for Land Use and Transportation (IFPLUT) 2003

Following the objectives of the 2002 National Spatial Strategy (see page 43 of the NSS) and the DTO’s 2000 Strategy ‘A Platform for Change’, Naas Town Council (NTC) and Kildare County Council (KCC) prepared an ‘Integrated Framework Plan for Land Use and Transportation’ (IFPLUT) for Naas in 2003.

The purpose of the Naas IFPLUT was to set out an integrated framework plan for the future development of the town up to 2020. The primary and over-riding objectives of the framework plan were based on the principles of sustainable development and were:

- To promote and encourage the development and growth of Naas in line with the principles of sustainable development.
- To promote an appropriate balance of employment, residential and service facilities (schools, shopping, community facilities etc.) and land uses that will increase the self-sufficiency of the town and support its role as a key part of a designated Primary Development Centre in the Greater Dublin Area.

TP 8: To seek the provision and extension of comprehensive footpath links to town and village centres and schools where deficits exist and promote permeability throughout towns and villages in the county.

ST 2: To encourage and facilitate safe walking and cycling routes as a valuable form of transport, as a healthy recreational activity and an alternative to the car.

ST 17: To facilitate the construction of cycleways throughout the county and to integrate these cycleways with the DTO cycling policy for the GDA (September 2006) as may be amended

The proposed scheme supports these focus areas by firstly transferring traffic from the towns of Naas and Sallins to the proposed road development. This facilitates the improvement of the streetscapes in these areas to enable workers/school children to commute by walking and cycling. This generates a safer environment for cyclists and pedestrians.

Pedestrians and cyclists will be facilitated with a shared footway and two-way cycle track facility on the eastern side of the bypass as far as the railway crossing whereupon pedestrians and cyclists will be able to connect to the local road network, providing access to the Grand Canal, Sallins town and Naas town. Sallins Link Road will facilitate pedestrians and cyclists with footways and one-way cycle tracks provided along both sides of the carriageway.

In addition, in the longer term, the proposed scheme will assist in the achievement of the CDP Longer term objective (LT3) “*To develop a public transport hub near Naas which will connect road, rail transport and public bus transport*”, should such development proceed.

2.6.3 Naas Town Development Plan 2011 – 2017

The Naas Town Development Plan 2011-2017 (*the NTDP*) was adopted by Naas Town Council on 9 May 2011, and came into effect on 6 June 2011. It replaces the Naas Town Development Plan 2005 – 2011. The current NTDP retains objectives included in the previous plan with regard to the provision of an additional interchange on the M7 with access to Millennium Park (at Section 7.8.4 of the current NTDP) and the provision of a ‘*park and ride*’ site in the vicinity of Naas (at Section 7.7.1 and 7.8.2 of the current NTDP).

Specific relevant objectives of the NTDP are as follows:

“RPO5: To examine and assess the possibility of providing a link road from the proposed Sallins By-pass to connect with the existing and planned road network in Naas, in conjunction with the National Transport Authority and the National Roads Authority.” [Section 7.8.4 of the NTDP]

“RPO6: To facilitate provision of an additional motorway interchange along the M7 Naas By-pass, subject to NRA agreement. The Interchange shall be appropriately designed and scaled to provide access to the Millennium Park and the Northwest Quadrant Masterplan Lands.” [Section 7.8.4 of the NTDP]

Section 7.8.4 of the NTDP (*‘Road Programme Objectives’*) states that it is an objective to carry out a number of specific transportation projects during the Plan

period and reference is made to Map 7.1 and Map 14.1 for indicative roads alignment as illustrated in **Figure 2.2 V3** and **Figure 2.3 V3**. The indicative location of the proposed interchange is indicated on Map 7.1 of the NTDP (**Figure 2.2 V3**):

Other relevant objectives of the NTDP are as follows:

“GT2: To support and promote the use of sustainable transportation modes in Naas and to seek to develop Naas as a “model town” for sustainable transport where pedestrian and cyclist activities are accommodated and encouraged”. [Section 7.7.1 of the NTDP]

“GT5: To provide a road network which is safe and efficient for all road users while being cognisant of the requirements of all traffic, including motorised vehicles, pedestrians and cyclists”. [Section 7.7.1 of the NTDP]

“GT15: To ensure that the national roads system is planned for and managed in an integrated manner enabling economic development of Naas and the wider area while encouraging a shift towards more sustainable travel and transport in accordance with the Draft Spatial Planning and National Road Guidelines (DoEHLG, 2010) and as subsequently amended.” [Section 7.7.1 of the NTDP]

“WC1: To promote and encourage sustainable and environmentally friendly forms of transportation such as cycling and walking in accordance with national and regional walking and cycling policies”. [Section 7.7.4 of the NTDP]

“WC4: To facilitate and encourage cycling as a more convenient and safe method of transport through an integrated network of safe and convenient cycle and pedestrian routes throughout Naas”. [Section 7.7.4 of the NTDP]

“GO4: To examine in conjunction with the National Transport Authority, the provision of a Park and Ride site in the Naas area to serve both commuters to Dublin and local trip makers and to investigate the possible part use of this site as a HGV parking area”. [Section 7.8.1 of the NTDP]

“GO8: To increase the level of access within Naas to a choice of transport modes and, in particular, to promote forms of development that reduce dependence on private car transport”. [Section 7.8.1 of the NTDP]

“STO5: To examine, in conjunction with the National Transport Authority and the National Roads Authority the provision of a Park and Ride site on the Dublin Road, in close proximity to the alignment of the Naas Ring Road/N7 to serve both commuters to Dublin and local trip makers.” [Section 7.8.2 of the NTDP]

The proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme supports these objectives by firstly transferring strategic/non-local traffic from the towns of Naas and Sallins to the proposed road development. This facilitates the improvement of the streetscapes in these areas to enable workers/school children to commute by walking and cycling. This generates a safer environment for cyclists and pedestrians.

In addition, pedestrians and cyclists will be facilitated with a shared footway and two-way cycle track facility on the eastern side of the bypass as far as the railway crossing whereupon pedestrians and cyclists will be able to connect to the local road network, providing access to the Grand Canal, Sallins town and Naas town. Sallins Link Road will facilitate pedestrians and cyclists with footways and one-way cycle tracks provided along both sides of the carriageway.

The proposed scheme which includes the Sallins Link Road will provide a convenient connection from the motorway network to the existing Sallins Train Station, and will encourage greater use of the existing 'park and ride' facilities.

Flood Risk Assessment

With reference to surface water and drainage issues as considered by the NTDP (at Section 8.8.3), it is the policy of the council:

“SW4: To ensure that development proposals for lands that are identified in the Naas Town Council Strategic Flood Risk Assessment (Map 8.1) as being located within an area of potential flood risk, are accompanied by a site specific flood risk assessment appropriate to the type and scale of the proposed development.”

The proposed location of the motorway interchange is located within an area of potential flood risk with reference to NTTDP Map 8.1. In this regard, this EIS includes a site specific flood risk assessment which is appropriate to the type and scale of the proposed road development.

In particular, Section 17.5 of this EIS outlines the extensive mitigation measures that will be required to minimise any potential risk to the hydrological environment and consequently aquatic ecology and flood risk during the construction phase of the proposed road development. Construction activities are noted to pose a significant risk to watercourses and the EIS notes that Water Quality Monitoring will be required prior to, during and post construction.

With regard to the Operational Phase, the EIS states that all rainfall runoff will be prevented from discharging directly to the receiving surface waters by the proposed road sustainable drainage system. Road runoff will only outfall to receiving surface waters at specified outfall locations. Catchment sizes will be conserved as far as practicable by minimising diversion of sub-catchment runoff from one watercourse into another. The proposed drainage attenuation system will be sized to accommodate any potential increase in surface water runoff and accommodate increased rainfall during storm events up to the 30 year return period storm. For ponds designed in flood prone areas this design is increased to cater for storm events up to the 100 year return period storm.

Section 17.6.2 of the EIS, relating to Flood Risk, states that there is a potential to increase peak flows and runoff volume due to the increased impermeable area associated with the proposed road development. However, the EIS adds that provided that all mitigation measures as stated in Section 17.5 are implemented, negative impacts on flood risk due to increased runoff are not anticipated for design events of up to the 30 year return period event, with the exception of the River Liffey catchment where negative impacts on flood risk due to increased runoff are not anticipated for design events of up to the 100 year return period event.

“PC 11: To facilitate and encourage cycling as a more convenient, popular and safe method of transport, through the designation of a cycle network, linking population, commercial, community facilities and transport nodes”.

The proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme will encourage people to commute by walking and cycling as opposed to depending on vehicle transport by removing the strategic traffic from the town of Sallins, thus generating a safer environment for cycling and pedestrians.

In addition pedestrians and cyclists will be facilitated with a shared footway and two-way cycle track facility on the eastern side of the bypass as far as the railway line whereupon pedestrians and cyclists will be able to connect to the local road network, providing access to the Grand Canal, Sallins town and Naas town. Sallins Link Road will facilitate pedestrians and cyclists with footways and one-way cycle tracks provided along both sides of the carriageway.

“TR 3 (ii): Construct new footpaths that are accessible to the mobility impaired”.

The proposed pedestrian links will comply with the NRA’s Design manual for Roads and Bridges.

Natural Heritage

Section 6.1.1 of the LAP relating to ‘Natural Heritage Areas and Special Areas of Conservation’ states that:

‘The most important habitats in the County are afforded protection under National and/or European legislation by way of designation as proposed Natural Heritage Areas (pNHA) and candidate Special Areas of Conservation (cSAC). The pNHA sites, afforded protection under the Wildlife (Amendment) Act 2000, were formerly designated as Areas of Scientific Interest. The SAC sites are designated under the EU Habitats Directive (92/43/EEC), which was transposed into Irish law in the European Communities (Natural Habitats) Regulations, 1997’.

The Grand Canal is a designated Natural Heritage Area (No. 02104).

Section 10.2.1 of the LAP states that in addition to the policies of the Council outlined in Chapter 17 of the Kildare County Development Plan (2005-2011) or the relevant chapter of any subsequent County Development Plan; it shall be an objective of the Council:

***NH 1** To protect all designated wildlife sites, including any additions or amendments to these, from any development that would adversely affect their conservation value.*

***NH 2** To identify, protect, conserve, and enhance, wherever possible, wildlife habitats and species of local importance, not otherwise protected by legislation. Such habitats would include woodland, river, grassland areas and field boundaries (hedgerows, stone walls and ditches). Such features form part of a network of habitats and corridors, which allow wildlife to exist and flourish.*

NH 3 To have regard to the County Bio-Diversity Plan, and integrate the consideration of bio-diversity into all Council actions and work programmes in order to ensure the protection and enhancement of this important aspect of the local environment.

NH 4 To ensure that any development proposal within the vicinity of or having an effect on a designated site, will provide sufficient detail illustrating how it will impact upon the designated site and will include proposals for appropriate amelioration. In all such cases the developer shall consult with the National Parks and Wildlife Section of the DoEHLG.

NH 5 To protect, by way of tree preservation orders, trees and groups of trees of special amenity value at the following locations; (See Map 1)

– Along the Grand Canal.

– Trees along the Straffan Road bordering the GAA grounds and Sallins Lodge.

– Along the western side of the Clane road on the way out of Sallins

– Along the Osberstown Road.

NH 6 Development shall be prohibited where it is likely that damage would be caused either to trees protected by a Tree Preservation Order or, to those which have a particular local amenity or nature conservation value. Development that requires the felling of mature trees of amenity value, conservation value or special interest notwithstanding the fact that they may not be listed in this plan, will be discouraged.

NH 7 To encourage the protection of hedgerows, which provide a unique habitat for wildlife. It shall be expected that all new developments protect mature hedgerows and include hedgerows as an integral part of the overall development design.

NH 8 To preserve views and prospects to and from the River Liffey and Grand Canal and to ensure that further development along either of the water systems does not affect the quality of either the scenic viewpoint or the waterways amenity.

New development adjacent to the riverside amenity area shall be restricted where such development could present a negative visual effect or disrupt the vistas available.

NH 9 To conserve and protect the natural habitats in the River and Canal systems.

NH 10 Planning applications must;

(i) Identify all ecological corridors, which are present on the proposed development lands (including hedgerows and masonry stone walls) that are likely to be affected by the development proposal

(ii) Identify any losses to these corridors which would result if the application in question was granted, and

(iii) Show that such losses would be fully offset if the application was to be granted through the replacement of the relevant corridors, with corridors composed of similar species prior to any losses to the existing corridors.'

With reference to the above objectives, we refer to Chapter 14 of this EIS relating to an assessment of the likely impacts of the proposed development of the M7 Osberstown Interchange and the R407 Sallins Bypass, Co Kildare, on the ecological environment (i.e. flora, fauna and habitats). In particular, it is noted therein that the National Parks and Wildlife Service, the Department of Arts, Heritage and the Gaeltacht, and Inland Fisheries Ireland were all consulted regarding designated area boundaries, records of protected species of flora and fauna, and their concerns and requirement in relation to the proposed scheme. Potential impacts on Flora and Fauna have been identified and mitigation requirements have also been included.

With reference to the above objectives, we also refer to Chapter 10 of this EIS relating to Landscape and Visual Impact Assessment. This chapter sets out details of the receiving environment and the potential landscape and visual impacts. As a summary of impacts, the chapter states at Section 10.4.5 that the proposed road development will give rise to some level of significant landscape and visual impact – primarily related to Osberstown House; the crossing of Osberstown Local Road; and to the crossing of the Grand Canal. Otherwise, initially significant landscape and visual impact can be directly mitigated and the scheme readily assimilated into its setting. Both general and specific mitigation is proposed in association with the scheme. With reference to Residual Impacts, Section 10.6 of this EIS notes that, as with all such developments, the proposed road, by the means of its very presence will have a permanent effect and therefore some degree of residual impact on the landscape and visual character of its immediate corridor. Nevertheless, Section 10.6 of this EIS adds that it is considered that with the gradual establishment of proposed landscape mitigation measures, the road will be successfully integrated within its landscape setting in the longer-term.

Additionally, Section 7.1 of the LAP, relating to Amenity and Recreation, states that in addition to the policies of the Council outlined in Chapter 13 of the Kildare County Development Plan (2005-2011) or the relevant chapter of any subsequent County Development Plan, it shall be an objective of the Council:

‘AR 7 Any development along the Liffey Valley will be required to take cognisance of the Liffey Valley Strategy ‘Towards a Liffey Valley Park’ and in particular to the vision and objectives set out within the Strategy. The following policies from the Strategy will be particularly relevant to developments along the Liffey corridor.

- *It is recommended that for large planning applications that during the planning application process, (covered under the Planning and Development Act 2000) and where areas fall within the visual catchment of the river, such applications should have a visual impact assessment. Mitigation measures shall apply in respect of any potential adverse visual impacts in a manner that is consistent with Strategy objectives.*
- *Any large applications that fall within the immediate catchment of the river as identified in the Strategy should include a full ecological survey as part of the application process. Appropriate consideration of the potential to impact on water quality shall also be taken into account with respect to the requirements of the Water Framework Directive Regulations.*

AR 8 *To protect views of the canal from the Canal Bridge.*

AR 9 *To promote the Grand Canal as a valuable amenity resource in co-operation with Waterways Ireland and any other relevant bodies.’*

Section 11.1 of the LAP also states that:

‘ENV 5 The Council will seek to comply with the provisions of the Environmental Noise Directive. The Council will develop and incorporate as part of this plan, any necessary surveys, action plans or constraints on future residential developments adjacent to roads or railways that currently fall, or that will fall, within the criteria of the Directive.’

As mentioned above, we again refer to Chapters 10 and 14 of this EIS relating to Landscape and Visual Impact Assessment and an Assessment of Impacts on the Ecological Environment, respectively both of which include mitigation proposals in respect of any potential adverse impacts. We also refer to Chapter 11 (Noise and Vibration) which addresses impacts and includes mitigation proposals relating to noise and vibration. Lastly, we refer to Chapter 17 of the EIS relating to Hydrology which has taken into account the requirements of the Water Framework Directive Regulations with regard to the proposed development.

2.6.5 Proposed Sallins Local Area Plan 2014 to 2020

In February 2013 Kildare County Council issued a public invitation for Pre-Draft Submissions on Proposed Local Area Plans for various Kildare towns, including Sallins. Notwithstanding the fact that the present Sallins LAP 2009 was set to run until 2015, the Council took the decision to initiate an early review of this LAP in order to ensure that it complies with the objectives of the Kildare County Development Plan 2011-2017, including the County Development Plan’s Core Strategy and Settlement Strategy.

A Draft Local Area Plan for Sallins will not be published until 2014. However the Council published a Background Issues Paper in February 2013 to accompany the invitation for Pre-Draft Submissions.

With reference to ‘Movement and Transport’ issues in Sallins, the Background Issues Paper states that:

‘The new Local Area Plan will promote integrated land use and transportation planning to further support and encourage more sustainable modes of travel. This includes ensuring that the design and layout of new developments provide permeability, linkages and connectivity to their surrounding areas, thereby minimising local trips by the private car. Importantly, it also means ensuring new development takes place in the right location in proximity to public transport routes and near local services, thus reducing travel demand. Walking and cycling are important parts of the transport system of many towns. In addition walking and cycling routes should be continuous with links onto longer distance routes where possible.’

In particular, the Background Issues Paper states that:

“The existing [Sallins] LAP contains an objective for the provision of a new road from Clane Road to the Naas Road (the Sallins Bypass).”

Subject to the provisions of Section 20 of the Planning and Development Acts 2000 to 2011 (relating to the adoption of Local Area Plans, including the power of Council members to make, amend or revoke a LAP), Kildare County Council has confirmed that it proposes to retain and include the various objectives in the current (2009) LAP in the proposed 2014-2020 Draft Sallins LAP which relate to both the construction of the proposed R407 Sallins Bypass and to investigating the feasibility of a regional transport hub in Sallins. In this regard, Kildare County Council also proposes maintain the indicative alignment of the Sallins Bypass in the proposed 2014-2020 Draft Sallins LAP as currently indicated on the Road Objectives Map in the current (2009) LAP or as emerges following the statutory consultation/planning process for the proposed Sallins Bypass.

2.6.6 Naas Northwest Quadrant Masterplan 2007

The Northwest quadrant of Naas is an area comprising approximately 300 hectares of mostly greenfield lands of which 247 hectares were identified under the Naas Town Council Development Plan 2005-2011 for the preparation of a Masterplan.

Section 7.2.3 of the Naas Town Development Plan 2005 (NTDP) noted that:

“The Northwest Quadrant has been identified as being the most appropriate location for the future expansion of the residential area of the town.”

The NTDP 2005 further stated at Section 7.2.3 that:

“The Council recognises that the development of these lands represents a major opportunity to achieve the co-ordinated and comprehensive development of housing and associated recreational, commercial, educational and community facilities in Naas.”

It is envisaged that there may be opportunity to accommodate up to 6,000 employees in the area. There is also an opportunity for reverse commuting from Dublin given the proximity to the rail station in Sallins. The Naas Northwest Quadrant Masterplan, (2007) sets out the context, goals, objectives and structure for future development of the Northwest Quadrant to ensure that development occurs in a sustainable and planned manner. Future development within the Masterplan lands must be of high quality and should comply with urban design guidance and development management standards contained in this Plan.

The proposed scheme will provide a convenient connection from the motorway network to the existing Sallins Train Station, and will encourage greater use of the existing ‘park and ride’ facilities. The Scheme will reduce congestion in Sallins and the surrounding local/regional road network thereby facilitating growth in the Northwest Quadrant. It provides cyclist / pedestrian facilities also complementing the objectives of the Masterplan.

2.7 Conclusion

Both Kildare County Council and Naas Town Council support the proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme as outlined in their respective development plans and in the Sallins Local Area Plan. This review of National, Regional and Local planning policy considers that the provision of the Scheme will:

- Facilitate and promote the development of Naas as a Large Growth Town I and a Primary Development Centre within the context of both the Regional Planning Guidelines for the Greater Dublin Area and the National Spatial Strategy respectively.
- Will, in conjunction with the proposed M7 Naas to Newbridge By-Pass Scheme, relieve peak period traffic congestion currently experienced at the existing ‘Maudlins’ and ‘Newhall’ M7 Interchanges as well as the local and regional road network by providing additional connectivity between the local and regional network and the national road network.
- Provide a convenient connection to the existing Sallins train station, and will encourage greater use of the existing ‘park and ride’ facilities.
- Facilitate improved public transport services including a north/south public transport link across the M7 Motorway between Sallins and Naas in accordance with the objectives of the Kildare County Development Plan 2011 to 2017.
- Provide for the future achievement of the Sallins Local Area Plan 2009 objective for a Public Transport Interchange connecting the M7 Motorway and the railway (the Sallins / Regional Railway Interchange Station proposed by the Sallins LAP)
- Relieve congestion within the town of Sallins, which will facilitate greater local accessibility within the town, with an improved streetscape, which will encourage local growth.

- Facilitate planned development of zoned land within the Naas Northwest Quadrant and will also provide connectivity to the Regional Road Network (R407 Sallins Bypass) to the north of the M7.

Therefore:

- Having regard to An Bord Pleanála's previous reason for refusal, Ref. PL09.HA0018 (that it would be premature to determine the application for the M7 Osberstown Interchange Motorway Scheme in advance of, or separately from, the determination of the route and design of the R407 Sallins Bypass), this application has appropriately and comprehensively addressed this reason for refusal.
- Having regard to the objectives of the Regional Planning Guidelines for the Greater Dublin Area this proposal will encourage the concentration of growth in the designated large growth town of Naas and will increase connectivity between this designated town (including areas designated for economic development) and national transport routes (including orbital as well as radial routes). This proposed scheme will also facilitate improved public transport links for the town of Naas to the Sallins Station and the linkage onwards to the adjoining towns of Newbridge and Kilcullen in accordance with the recommendations of the RPGs.
- Having regard to the objectives of the National Spatial Strategy this proposal will support the designation of Naas as a Primary Development Centre, with self-sustaining growth and a move away from the dependence on Dublin, particularly for employment, with the facilitate improved public transport links for the town of Naas, the greater use of the existing 'park and ride' facilities at Sallins and the proposed connection of areas designated for economic development to the motorway.
- Having regard to the National Development Plan this proposal will promote the ordered and sustainable growth of Naas, will promote the consolidation of Sallins's local growth and will help deliver more spatially balanced patterns of economic development and population growth throughout the Greater Dublin Region. The proposed scheme will also promote more public transport based mobility (including use of the Sallins park and ride facility) and will relieve existing motorway congestion in the vicinity of Naas as well as non-local traffic congestion in Sallins.
- Having regard to 'Smarter Travel', the New Transport Policy for Ireland (2009), this proposal will, in conjunction with the proposed M7 Naas to Newbridge By-Pass Scheme, alleviate traffic congestion at the existing Newhall and Maudlins interchanges and will additionally provide an improved link to an enhanced Sallins Train Station from the M7, from Naas, and in particular from Naas's Northwest Quadrant. This, combined with the provision of strategic 'Park and Ride' facilities in the future, will make it more attractive to use public transport and encourage a modal shift away from private transport.

- Having regard to the NTA's 'Greater Dublin Area Draft Transport Strategy for 2011-2030 (2030 Vision)' this proposal will facilitate an improved link to an enhanced Sallins Train Station from the M7, from Naas, and in particular from Naas' Northwest Quadrant, which, combined with the provision of strategic 'Park and Ride' facilities in the future, will make it more attractive to use public transport and encourage a modal shift away from private transport.
- Having regard to the National Cycle Policy (2009) this proposed scheme will facilitate pedestrians and cyclists with shared footpaths and cycle track facilities connecting to the local road network. In addition, the proposed scheme will enable people to commute by walking and cycling as opposed to depending on vehicle transport by removing the strategic traffic from the town of Sallins, thus generating a safer environment for cyclists and pedestrians.
- Having regard to the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) this proposed scheme has demonstrated the need for additional connectivity, by reference to policy considerations such as the National Spatial Strategy, Regional Planning Guidelines and in the Greater Dublin Area, the National Transport Authority's transport strategy as set out above and below.
- Having regard to the specific objective in the Kildare County Development Plan 2011 to 2017 (Objective RP2) to provide this proposed development, this proposal is a key component for the continued development of the region and is required to reduce traffic congestion in Naas and Sallins, while also providing a high quality access to Sallins Train Station (and park and ride facility) from the M7 Motorway Corridor.
- Having regard to the Naas IFPLUT 2003 this proposal will help facilitate the future realisation of a direct link from Naas through the designated growth area of the Northwest Quadrant to Sallins Train Station.
- Having regard to the regard to the specific objective in the Naas Town Development Plan 2011 to 2017 (Objective RP06) to provide this proposed development, this proposal would facilitate the link between Sallins Train Station, via the proposed R407 Sallins bypass, south to Osberstown/ Millennium Park and Naas Town Centre with the associated relief of traffic congestion.
- Having regard to the specific objectives in the Sallins Local Area Plan 2009 (Objectives TR3 (iv) and TR3 (v)) to provide this proposed development, this proposal would link into the proposed R407 Sallins Bypass which would assist RPG objectives to facilitate accessibility/connectivity from designated growth towns to National Transport networks via main radial/orbital intersections and to high quality rail services, as well as relieving traffic congestion.

Having regard to the foregoing, this submission is satisfied that the construction of the proposed M7 Osberstown Interchange and R407 Sallins Bypass Scheme will be in accordance with the policies of the Regional Planning Guidelines for the Greater Dublin Area, the Kildare County Development Plan, the Naas Town Development Plan and the Sallins Local Area Plan and will be consistent with the proper planning and sustainable development of the area.

2.8 References

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