

Draft Leixlip Local Area Plan, 2020 – 2026
c/o Senior Executive Officer
Planning Department
Kildare County Council
Áras Chill Dara
Devoy Park
Naas
Co. Kildare

Dáta | Date
10 July, 2019

Ár dTag | Our Ref.
TII19-105917

Re: Draft Leixlip Local Area Plan, 2020 - 2026

Dear Sir/Madam,

The Authority welcomes referral of the Leixlip Draft Local Area Plan, 2020 – 2026, and the opportunity to comment on emerging policies and development objectives scheduled in the Draft Plan. The Authority provides the following comments for the Council's consideration.

1. Managing Exchequer Investment and Statutory Guidance

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe. The TEN-T regulations target a gradual development of the transport network with the core network a priority (by 2030) followed by the remainder of the comprehensive network (by 2050). The TEN-T regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe.

In Ireland, the core network currently consists of the route from Northern Ireland via Dublin to both Cork/Ringaskiddy and Limerick/Foynes. The Council will be aware that the M/N4 route is identified as part of the TEN-T Comprehensive Network and is a highly important inter-urban transport corridor; these designations have repercussions and action requirements for policies and objectives to be included in the new Local Area Plan.

It is of particular importance that policies and objectives are drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic competitiveness by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

There is a critical need to manage these assets in accordance with national policy as outlined in Smarter Travel (DTTAS, 2009) and the provisions of the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). While Section 8.3 states that the Local Area Plan acknowledges the importance of accessibility to the strategic road network for major industrial/employment generating facilities in Leixlip, the Draft Local Area Plan includes no reference to the DoECLG Guidelines, nor to the critical need to safeguard the strategic function of the national road network in the area. TII recommends that this requirement is reflected in the Local Area Plan prior to adoption.

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It is noted that Objective MT3.2 (v) includes the objective to support and implement 'Capacity enhancements of the M4 mainline and M4 / R449 junction as provided for in the NTAs Transport Strategy for the Greater Dublin Area 2016-2035 and the Draft Regional Spatial and Economic Strategy'. Such an objective does not appear consistent with National Development Plan, NTA Transport Strategy, Regional Spatial and Economic Strategy objectives or the provisions of the DoECLG Spatial Planning and National Roads Guidelines.

In terms of continued investment in the EU Ten-T Comprehensive Network, in the interests of consistency, TII would welcome the appropriate national road scheme objective being referred to as M4 Leixlip to Maynooth consistent with Project Ireland 2040 and the recently adopted Eastern and Midland Regional Authority Regional Spatial and Economic Strategy.

A separate road improvement proposal included in the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035, includes proposals to 'Enhance orbital movement, outside of the M50 C-Ring, between the N3, the N4 and N7 national roads, by the widening of existing roads and the development of new road links'. Section 5.8.2 of the NTA Strategy refers.

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

The potential routes identified are the alternative options available and a number of the options have tie-in locations at either M4 Junction 5 or Junction 6 and may necessitate additional river crossings. TII would welcome consideration by the Council of the alternative potential routes identified when finalising the Local Area Plan and request that provision is made within the text of the plan identifying the potential requirement for additional river crossings to give effect to the provisions of the NTA Strategy. Reference could also be made to national road network resilience and the related NTA Strategy provisions within the text of the Local Area Plan prior to adoption. TII is available for consultation in relation to this matter.

Specific Development Objectives/Proposals

TII acknowledges the Local Area Plan Core Strategy Objective to facilitate sustainable intensification in the town centre and in established residential areas and welcomes this approach to consolidation of the existing built up areas.

However, it is noted that significant areas are identified with zoning objectives to the west of the town, including the Leixlip Gate Key Development Area and new Enterprise and Employment zoning designation at Collinstown. Proposals related to the redevelopment of the Hewlett Packard site to the south of the M4 are also identified in the Draft Local Area Plan. The lands identified for the development of a new residential and community neighbourhood (at Confey) and the development of an enterprise and employment campus (at Collinstown) are identified in the context of the longer term development of Leixlip.

The Draft Local Area Plan requires that development proposals related to the key development areas identified at Confey and at Collinstown are both subject to further detailed analysis;

- An overall Design Framework agreed with the Planning Authority for the lands at Collinstown, and
- A detailed Masterplan, the contents to be agreed with the Planning Authority, for the lands at Confey.

As outlined in previous submissions to Kildare County Council on the lands concerned, it is noted that the proposed design framework proposal and masterplan objective outlined in the Draft Local Area Plan provide for no statutory consultation with stakeholders. However, the DoECLG Spatial Planning and National Roads Guidelines require that planning authorities must ensure that they consult with the NRA (now TII) in preparing any local area plans or other non-statutory plans where there may be material implications for national roads.

Also, the DoECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use non-statutory documents for development management, planning authorities should incorporate them in the

development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks.

TII would welcome continued consultation and collaboration with the planning authority in the development of proposals relating to Collinstown and Confey.

TII acknowledges and welcomes that the relevant objectives for Collinstown and Confey areas, in accordance with the provisions of Objective MT3.11, require that significant development proposals are subject to Traffic Impact Assessment. Similarly, Section 12.4 requires the submission of a TTA for the Leixlip Gate Key Development Area.

The Authority acknowledges that the Leixlip Local Area Plan was informed by the preparation of a Strategic Transport Assessment (STA). To further develop the work undertaken, TII recommends that both the Design Framework for the lands at Collinstown and the detailed Masterplan for the lands at Confey would be subject to Transport Assessment to assess the cumulative transportation impact of the lands concerned. The preparation of more detailed analysis will assist in developing a robust development framework, including mitigation, phasing and funding requirements, facilitating the future development of Leixlip complementary to safeguarding the strategic function of the national road network and associated junctions.

This is also particularly relevant when considered in the context of Local Area Plan objectives related to the Hewlett Packard site and Key Development Areas all in the vicinity of the M4. Careful consideration will need to be given to the future development of the Hewlett Packard site and development proposals in this area will need to be subject to appropriate transportation assessment. TII would welcome this requirement reflected in the text of Section 6.1 and Section 6.2.1 of the Draft Plan where the Hewlett Packard site is discussed.

Other Specific Objectives

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

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

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

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

General Objectives

In more general terms, the Authority recommends that consideration is given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines into the Local Area Plan concerning specific objectives relating to Traffic and Transport Assessment, Road Safety Audit, Environmental Standards and Signage requirements, etc. where there may be implications for the strategic national road network. It is acknowledged that Section 7.3 addresses noise implications and the design of residential schemes in close proximity to heavily trafficked national roads.

Future Consultation

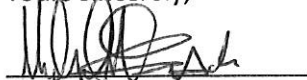
As outlined in the foregoing, TII would welcome consultation and collaboration with the planning authority in the development of proposals relating to Collinstown and Confey and in related to specific road schemes identified above.

In addition, the Draft Local Area Plan includes Objective MT3.4 to support the development of a North East Kildare Strategic Land Use and Transportation Study, TII would welcome consultation on this Study where there may be implications for the strategic national road network in the area.

Conclusion

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

Yours sincerely,



Michael McCormack
Senior Land Use Planner