



Naas / Sallins Transport Strategy

Stakeholder & Public Consultation No. 2

Submissions Report



Kildare County Council

Department of Roads, Transportation and Public Safety

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1.0 Introduction

The Naas/Sallins Transport Strategy has been prepared to aid in informing the future development of transport infrastructure throughout the Naas / Sallins Area. The Transport Strategy is intended to address current issues and anticipate future problems in the transport network. The provision of high-quality transport infrastructure is an essential component of urban regions and the delivery of sustainable development. Transport infrastructure provides the critical link between homes and activities such as work, school, college, leisure, shopping, healthcare and socialising.

The Naas/Sallins Transport Strategy outlines recommendations for the full range of transport components throughout the Naas / Sallins Study Area, including:

- Public Transport;
- Road Transport;
 - Road Schemes
 - Parking Options
- Non-Motorised Movement;
 - Permeability
 - Cycling
- Public Realm Improvements; and
- Land Use Scenario Assessments.

This submissions report provides details on the submissions received from both the public and stakeholders on the Draft Naas / Sallins Transport Strategy. The report outlines the following information:

- The purpose of the Naas / Sallins Transport Strategy (Section 2);
- Details of the consultation process and an overview of the responses (Section 3);
- Explanatory Note in relation to consultation submissions (Section 4);
- Detailed analysis of the Gallops Avenue and responses to issues raised (Section 5);
- Detailed analysis of Millbridge Street and responses to issues raised (Section 6);
- Details of the Stakeholder submissions received and KCC responses to same (Section 7);
- Details of the Public submissions received and KCC responses to same (Section 8); and
- Main changes to the Transport Strategy and conclusions (Section 9).



2.0 Purpose of the Naas / Sallins Transport Strategy

Transport infrastructure provides the critical link between homes and activities such as work, school, college, leisure, shopping, healthcare and socialising. From an economic perspective, businesses are reliant on efficient, safe and reliable transport in order to attract employees or customers and to transport goods across the country.

The Naas/Sallins Transport Strategy recognises the need to transfer journeys to public transport both internally within Naas and externally to and from other destinations. A key objective of the Naas/Sallins Transport Strategy is therefore to promote the improvement of public transport in terms of access and convenience to achieve this objective. However, it is also recognised that commuter traffic can only be moved away from the road network by the development of public transport that has sufficient capacity and a good level of service combined with good quality access and convenience. Whilst capacity and level of service are not controlled by the Local Authority, the Naas/Sallins Transport Strategy does press for their improvement and offers ideas on how this might be achieved.

As outlined in the introduction to this note the Naas/Sallins Transport Strategy outlines recommendations for the full range of transport components throughout the Naas / Sallins Study Area, including:

- Public Transport;
- Road Transport;
 - Road Schemes
 - Parking Options
- Non-Motorised Movement;
 - Permeability
 - Cycling
- Public Realm Improvements; and
- Land Use Scenario Assessments.

This multi-modal strategy will provide a blueprint for transport investment within Naas/Sallins and its surrounds which will support the delivery of sustainable development and the regeneration of the town and village centres. Whilst the Naas/Sallins Transport Strategy is a non-statutory plan its function is to aid informing future revisions of the statutory development plans for the area, namely the Naas and Sallins Local Area Plans.



The Naas / Sallins Transport Strategy will inform these local area plan revisions by providing a **comprehensive evidence-based approach** to the development of road-based and sustainable transport interventions which will support the Council's land-use plans. The transport interventions recommended in the Naas/Sallins Transport Strategy therefore do not have a statutory basis at present. However, it is intended that the transport interventions recommended in the Strategy will form the basis for transport policy and projects that will be given a statutory footing in future revisions of the Naas and Sallins Local Area Plans.

3.0 Consultation Details & Overview of Responses

A 'Phase 1' public consultation survey was undertaken during March and April 2019 which gathered views from the public on transport issues in Naas and Sallins as well as ideas for potential solutions. This feedback helped to inform the development of the measures in the draft Transport Strategy.

Following on from the initial consultation, KCC invited feedback from members of the public and relevant stakeholders on the specific measures contained in the Draft Naas/Sallins Transport Strategy in a second round of consultation.

This consultation period ran between late May to late June 2020. The consultation was conducted via the newly launched KCC Consultation Portal. Surveys were created for both members of the public and stakeholders. This consultation was non-statutory.

As part of the consultation, the Draft Naas/Sallins Transport Strategy Report and a Summary Consultation Document were provided via the online KCC Consultation Portal.

The purpose of this second consultation was to gather views on specific measures proposed in the Transport Strategy. Each submission was considered, and the points raised were noted by KCC. This consultation led to a number of changes, which have now been incorporated into the Final Naas/Sallins Transport Strategy Report.

Details of Consultation No. 2 are provided in Table 3.1 below. In total, there were 797 submissions from the Public (including for Residents Groups) and 33 from Stakeholders, meaning that there were 830 submissions to the consultation in total.



Naas / Sallins Transport Strategy
Stakeholder & Public Consultation No. 2
Submissions Report

Table 3.1: Details of Public & Stakeholder Consultation No. 2

Public Consultation No. 2		
Start Date of Consultation	29.05.2020 08:00 am	
End Date of Consultation	24.06.2020 11:59 pm	
Duration of Consultation	3 weeks 5 days	Originally due to end on the 19.06.2020 but was extended by 5 days to allow people more time to make a submission
Number of submissions from members of the Public and Residents Associations	797	Including responses to the online public survey, online stakeholder survey which were from a member of the public and any other responses submitted by post, CRM, email or directly into the KCC's offices.
Stakeholder Consultation No. 2		
Start Date of Consultation	22.05.2020 09:00 am	
End Date of Consultation	24.06.2020 11:59 pm	
Duration of Consultation	4 weeks 5 days	Originally due to end on the 19.06.2020 but was extended by 5 days to allow people more time to make a submission
Number of submissions from Stakeholders (i.e. not members of the Public or Residents Associations)	33	Including responses to the online stakeholder survey, online public survey which were from a Stakeholder and any other responses submitted by post, CRM, email or directly into the KCC's offices.

Details of the specific content within the Submissions is presented in Sections 7 and 8. However, a summary of the most frequently mentioned transport strategy proposals within submissions from the public is given in Figure 1 below. This gives a good overview of the main points of contention within the Draft Naas/Sallins Transport Strategy.

As can be seen from the figure, The Gallops Avenue is the most mentioned proposal in submissions received from the Public, with almost 40% of submissions referring to it. Similarly, there were a large number of submissions relating to permeability measures 4 and 6, around the Castlesize estate in Sallins and permeability measures 47 and 66 around Kingsfurze and Woodlands estates in Naas.



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The proposed Millbridge Street also received a high number of submissions, often coupled with submissions expressing concerns about other proposed developments around the Canal Harbour area in Naas.

These other developments included the Harbour bus interchange, the public transport only street linking to the Millennium Park ring road and the western spine bus route.

Reflecting the large volume of submissions in relation to certain objectives, this report includes detailed analysis of the road options The Gallops Avenue and Millbridge Street in Sections 5 and 6 respectively. These sections also provide responses to the most common issues raised in the submissions relating to these proposals.

There were a wide variety of issues raised in submissions from both the public and stakeholders. Kildare County Council considers this feedback very valuable and where appropriate, the information provided in this feedback has guided changes to the Final Naas / Sallins Transport Strategy Report (refer to Section 9). Full details of KCC responses to this feedback are provided in Sections 7 and 8 of this report. It should be highlighted that many of the issues raised are a matter for detailed design rather than this high-level Transport Strategy. An Explanatory Note giving further details in relation to this is included in Section 4.

KCC would like to thank members of the public and stakeholders who took the time to engage with the consultation process.

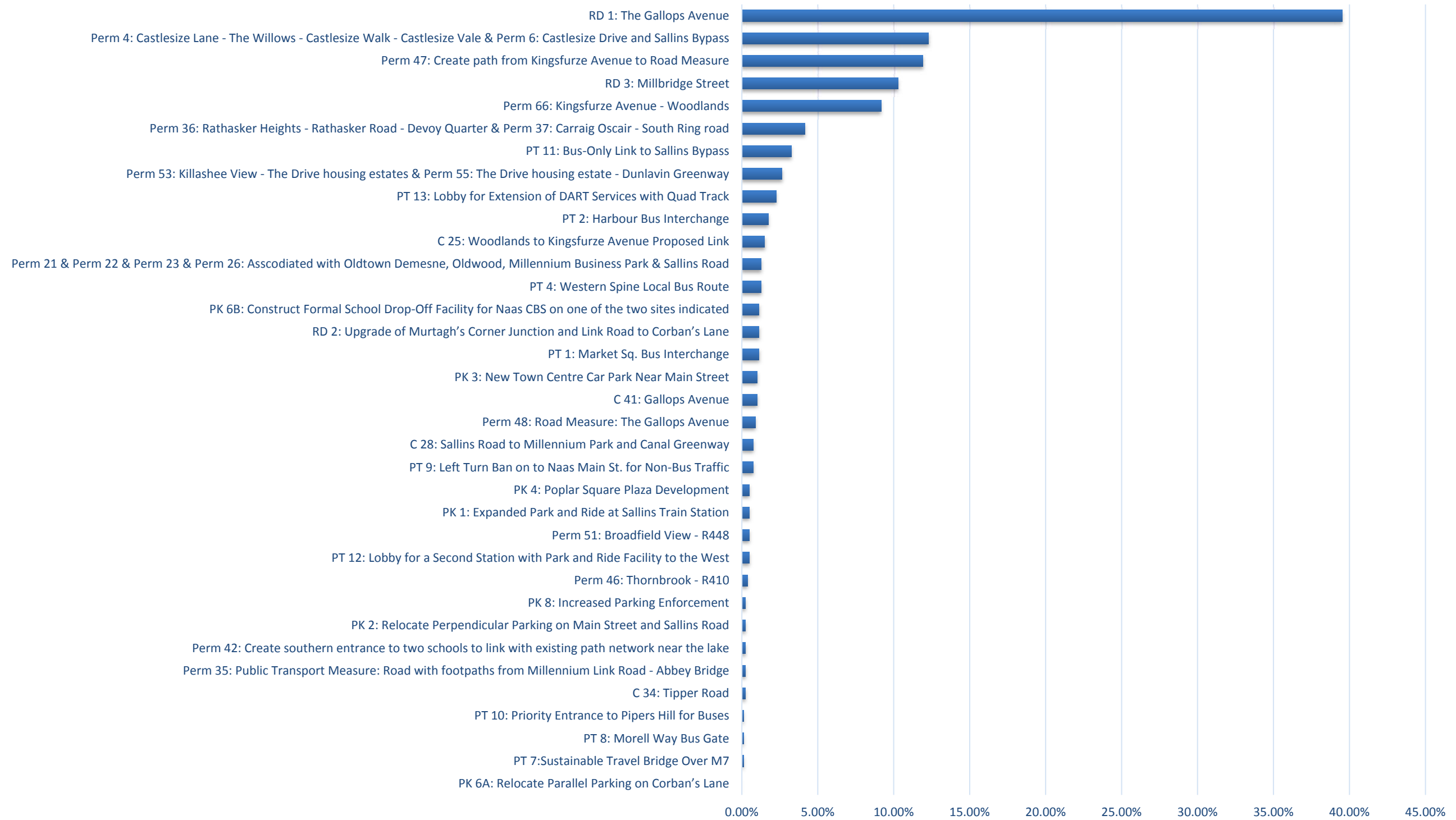


Figure 1: Percentage of Public Submissions in which specific objectives are raised



4.0 Explanatory Note in relation to Consultation Submissions

The Naas / Sallins Transport Strategy (NSTS) examines the transport network within the towns of Naas and Sallins in order to provide supportive analysis which will assist in providing an evidence-based development of future revisions of the Naas Local Area Plan (Naas LAP) and Sallins Local Area Plan (Sallins LAP). The strategy examines possible objectives which may be included as objectives in the Naas LAP and in some cases includes a high level Multi Criteria Analysis (MCA) which teases out options at a very high level.

The Naas LAP will bring forward objectives which may include those identified in the NSTS. However, it must be remembered that the objectives of the Naas LAP will then form the basis for individual projects. These projects will then be examined on their own merits and be subject to the rigorous analysis requirements of the Public Spending Code (PSC) and the Common Appraisal Framework for Transport Projects and Programmes (CAF). The PSC and CAF require the identification and examination of various options including the following:

- Do Nothing;
- Do Minimum;
- Pedestrian;
- Cycle;
- Public Transport in various forms; and
- Road or Street improvement.

While the Naas/Sallins Transport Strategy includes some high-level MCAs, these would not be sufficient for the purpose of assessing an individual project developed from an objective within the Naas LAP. They do not purport to be a definitive analysis of all the options for the possible objectives, but rather a broad reckoning which indicates they are suitable for inclusion as potential transport objectives for inclusion in the upcoming statutory LAP reviews.

Some of the submissions tend to look at the possible objectives as if they were projects under examination. This is not the case and while those comments would be valid in the context of any specific project, they are not relevant to the NSTS.

By way of example, take the possible objective of the public transport corridor between the town and Junction 9A on the M7.



In the context of a project this would have to be compared to the option to improvement of the Sallins Road to serve the same objective. It would have to examine options in relation to facilities for pedestrians, cyclists and other classes of vehicles.

Where submissions are directed toward the possible future specific project, these are noted. However, it is not possible to tease out the detail necessary for their analysis within the NSTS.

It should also be noted that the individual projects will be subjected to public consultation, environmental and heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.

5.0 The Gallops Avenue

The Naas/Sallins Transport Strategy examined a range of road transport interventions in the Naas/Sallins Area including two options for a relief road to the east of the existing Dublin Road R445 which accesses Naas to the east of the town. The Dublin Road is the primary connection to Naas Town Centre for traffic approaching from Dublin (see Figure 2). The Dublin Road has two lanes and is approximately 13.5m wide between the Big Ball Roundabout and the Roseville residential estate. Following the Roseville residential estate entrance, Dublin Road is approximately 10m wide. Pedestrian footpaths of between 2-3 metres width are provided on both sides of Dublin Road and there are four signalised pedestrian crossing points. However, there is no cycling infrastructure provided along the route.



Figure 2: Location of Dublin Road

This route is subject to extensive traffic congestion and delay with an Annual Average Daily Traffic (AADT) volume of 18,000 vehicles per day using the Dublin Road (R445), as noted in 2018 traffic surveys. This route is the busiest arterial traffic route into Naas and a key objective of the Naas / Sallins Transport Strategy was to examine options aimed at relieving traffic congestion along this route. Reducing traffic on the R445 Dublin Road and Main Street would facilitate the implementation of improved bus services, walking/cycling measures and public realm proposals along this route. This would have a major benefit for estates such as Ashgrove, Greenaun, Kingsfurze, Roseville and the Gallops.

Three relief road options were tested as part of this Transport Strategy to ascertain their potential benefit in relieving congestion along the Dublin Road, R445. The options are outlined in Figure 3 below, they were namely:

- Option 1 – The Gallops Avenue;
- Option 1 (Alt) – The Gallops Avenue (Alternative Route); and
- Option 6 – Outer Orbital Route.

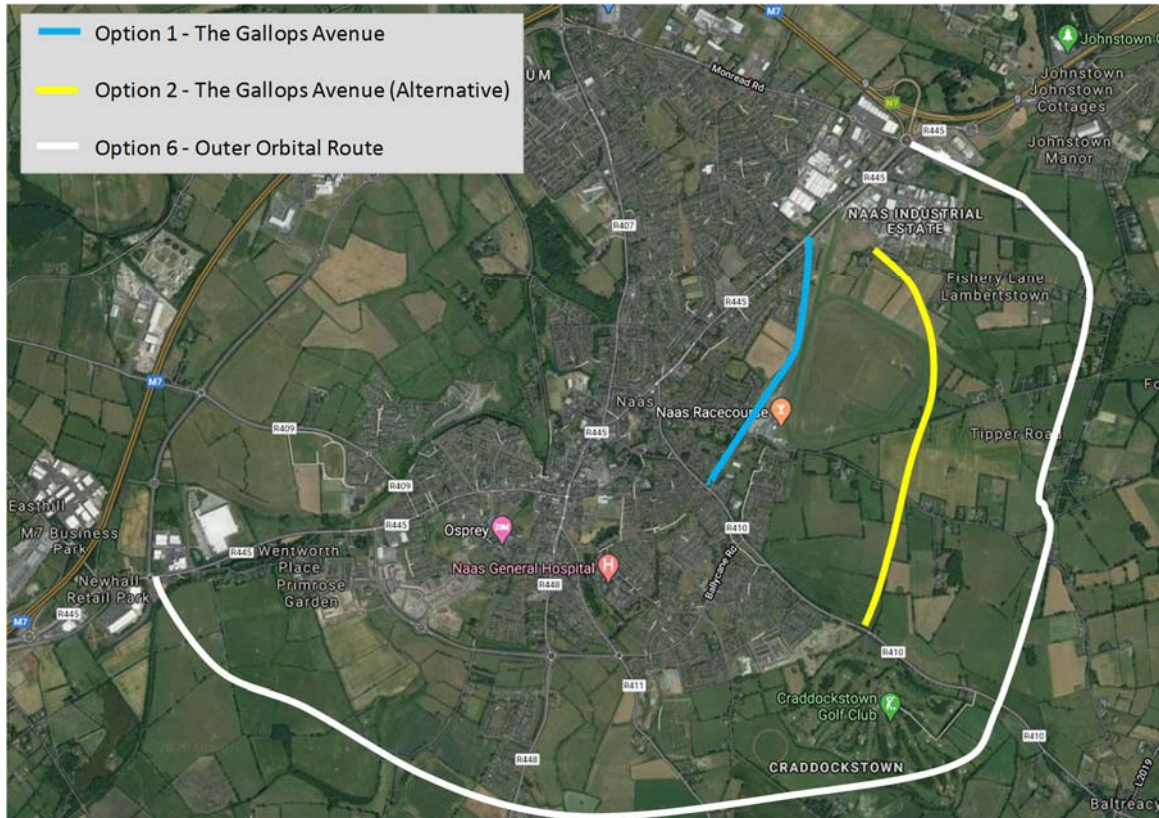


Figure 3: Naas Inner Relief Road Options Assessed

5.1 Testing Methodology

In order to assess the potential benefits of the relief road options a state-of-the-art local area model (LAM) was developed in the software VISUM version 18.02-13. VISUM is a comprehensive strategic traffic and transport planning package used around the world to assess new infrastructure, traffic management changes, local plan forecasting, economic analysis etc.

The starting point for the development of the Naas/Sallins LAM was an extract (or cordon) taken from TII's National Traffic Model. This cordoned model was then updated to reflect all roads of strategic importance in Naas/Sallins area and the zone structure was refined to reflect the intricacies of traffic movements in the Naas/Sallins Area. Detailed updates were made to the model network to reflect traffic signal timings, link and junction geometries and capacities and traffic loading points.

The model was then fully calibrated and validated in line with the requirements of TII's Project Appraisal Guidelines Unit 5.1 Construction of Traffic Models.



An extensive range of traffic data, collected in 2018, was used to ensure the model accurately reflected existing conditions. The traffic data included link volumes, junction turning movement counts, journey time data and traffic origin/destination information. The model was shown to achieve full calibration and validation criteria requirements for link flows, junction flows and journey time data and as such it is a robust and reliable tool to undertake comparative assessment of future road transport interventions in the Naas/Sallins area.

5.2 Analysis Results

The following section outlines the results of the analysis for each of the three relief road options assessed. The scheme options were analysed in the base year of the traffic model 2018, and in two future year scenarios, 2023 and 2030. The forecast planning data to estimate demand in the future years 2023 and 2030 was supplied by Kildare County Councils Planning Department and sense checked against forecast data from TII's National Traffic Model.

Table 5.1 and Table 5.2 below outline the results predicted by the Naas/Sallins LAM for each of the Dublin Road Relief Road options tested in the AM and PM peak hours. It can clearly be seen from the tables below that the Gallops Avenue option offers significantly more congestion relief to the Dublin Road than either of the alternative's tested. The reason is that a significant volume of traffic currently using the Dublin Road has a destination within Naas, options that are further removed from the existing Dublin Road therefore incur a greater travel time and distance penalty to traffic with a destination in Naas.

Table 5.1: Naas Inner Relief Road Options Assessed

Option	Percentage Traffic Reduction on Dublin Road
2018 AM - Option 1 The Gallops Avenue	35.0%
2018 AM - Option 1 The Gallops Avenue (Alt)	12.0%
2018 AM - Option 6 Outer Orbital Route	9.8%
2023 AM - Option 1 The Gallops Avenue	23.5%
2023 AM - Option 1 The Gallops Avenue (Alt)	12.2%
2023 AM - Option 6 Outer Orbital Route	7.6%
2030 AM - Option 1 The Gallops Avenue	24.2%
2030 AM - Option 1 The Gallops Avenue (Alt)	14.9%
2030 AM - Option 6 Outer Orbital Route	6.5%



Table 5.2: Naas Inner Relief Road Options Assessed

Option	Percentage Traffic Reduction on Dublin Road
2018 PM - Option 1 The Gallops Avenue	28.3%
2018 PM - Option 1 The Gallops Avenue (Alt)	14.8%
2018 PM - Option 6 Outer Orbital Route	13.5%
2023 PM - Option 1 The Gallops Avenue	18.1%
2023 PM - Option 1 The Gallops Avenue (Alt)	8.6%
2023 PM - Option 6 Outer Orbital Route	8.6%
2030 PM - Option 1 The Gallops Avenue	17.2%
2030 PM - Option 1 The Gallops Avenue (Alt)	8.6%
2030 PM - Option 6 Outer Orbital Route	8.2%

Figure 4, Figure 5 and Figure 6 below show graphically the congestion relieving benefit provided by each of the relief road options. The figures shown, are referred to as difference plots, and they compare the reduction traffic on existing roads in **blue** and the transfer of traffic to the new routes in **red**.

5.2.1 Option 1 – The Gallops Avenue

The Gallops Avenue is a proposed route connecting the R410 Blessington Road to the R445 Dublin Road with the objective of alleviating congestion on the R445 Dublin Road, R410 Blessington Road and R445 Main Street. Reducing traffic on the R445 Dublin Road and Main Street would facilitate the implementation of the bus route, walking/cycling measures and public realm proposals identified in the Naas/Sallins Transport Strategy.

This route was based on the Part 8 planning application for the Naas Inner Relief Road which was not approved by Councillors in the Naas Municipal District (17th June 2019). It is proposed that this corridor would be reimagined and redesigned to act as an eastern street connection which facilitates increased permeability for pedestrians and cyclists as well as drivers.

Figure 4 shows the traffic reassignment impacts (i.e. the re-routing of traffic) as a result of this proposal in the 2023 AM Peak Naas LAM. The figure shows a reduction in traffic (reduction in traffic is shown in blue) on the R445 Dublin Road, R410 Blessington Road and R445 Main Street as traffic re-routes to the proposed scheme (increase in traffic shown in red).

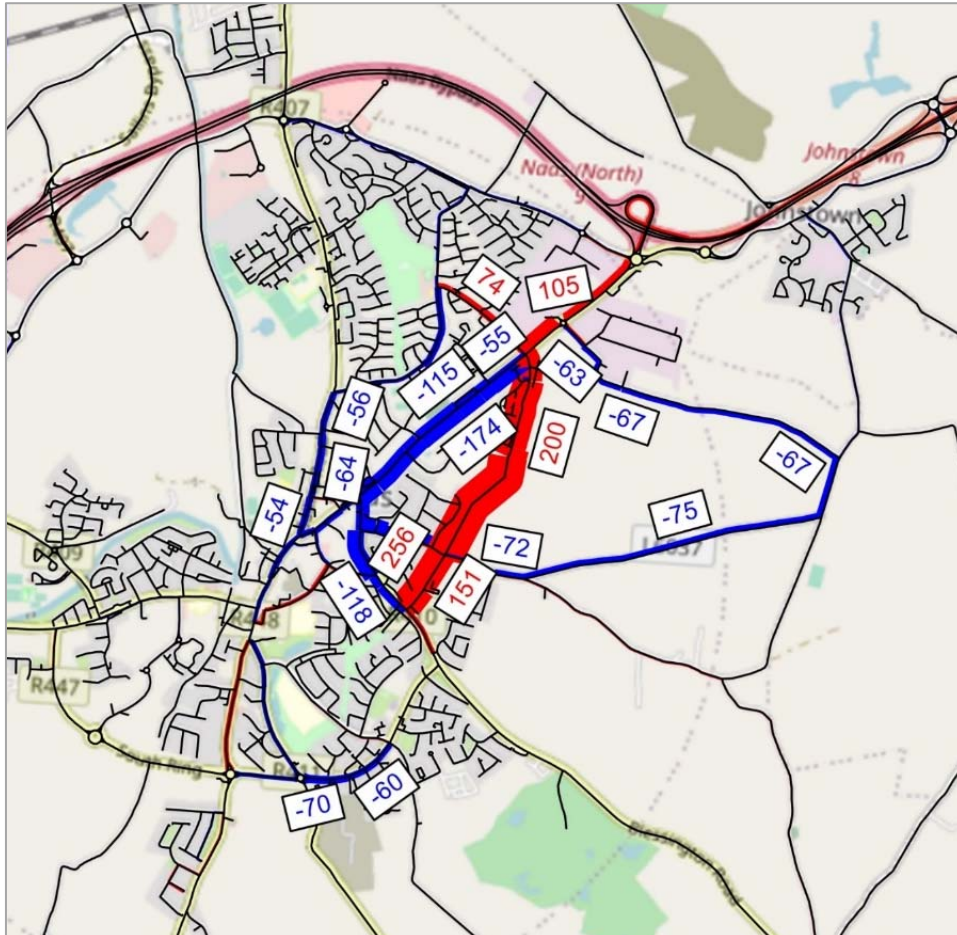


Figure 4: Gallops Avenue Difference Plot

5.2.2 Option 1 (Alt) – The Gallops Avenue (Alternative Route)

In addition to the preferred option which was selected for The Gallops Avenue (i.e. Option 1 above), an alternative option on a corridor located to the east of Naas Racecourse was also assessed.

The traffic reassignment impacts of this proposal in the 2023 AM Peak Naas LAM are illustrated in Figure 5. The figure shows a reduction in traffic on the R445 Dublin Road, R410 Blessington Road and R445 Main Street, however the scale of benefits when compared to Option 1 are considerably lower.

In the 2023 AM peak scenario the reduction in traffic on the Dublin Road is 23.5% in Option 1 compared to 12.2% in Option 1 (Alt), while in 2023 PM the reduction is 18.1% for Option 1 compared to 8.6% for Option 1 (Alt).



Additionally, this option has the effect of drawing traffic off local roads to the east (south of Johnstown). This is an undesirable effect and is not seen in the Option 1 difference plot.

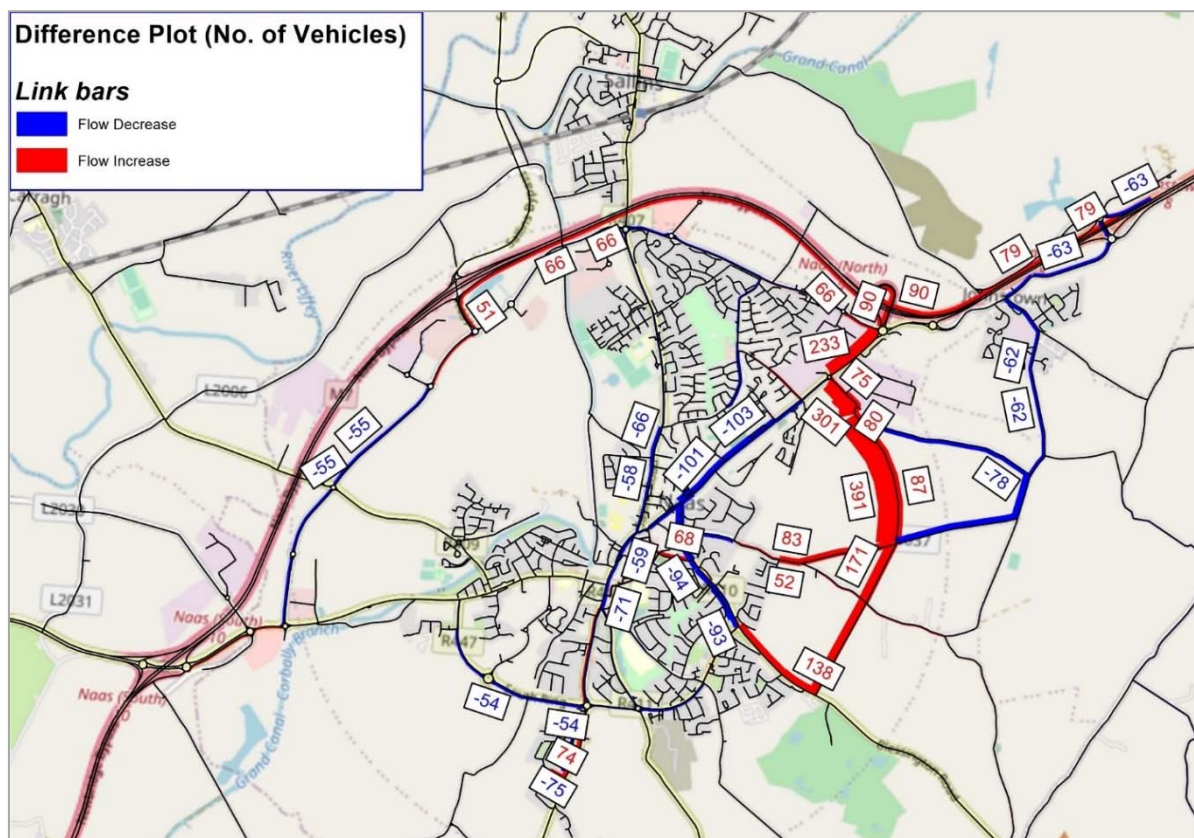


Figure 5: Gallops Avenue (Alternative) Difference Plot

5.2.3 Option 6 – Outer Orbital Route

An indicative Outer Orbital Route as illustrated in Figure 6 was assessed which would start at the Newbridge Road Roundabout on the R445 Newbridge Road and finish at the R445 Dublin Road at the Maudlins Roundabout. This route would be an outer ring and would link with the R448 Kilcullen Road, R411 Ballymore Road and the R410 Blessington Road along with other local roads.

Figure 6 shows the traffic reassignment impacts of the proposal and illustrates that the corridor would have limited impact on the town centre but would reduce traffic on the Naas Southern Ring Road and also draw traffic in from a number of local roads.



Nevertheless, this option has attracted significant criticism from residents currently living in housing estates along the proposed alignment of the Gallops Avenue and around the locations the proposed route would traverse. Notwithstanding the fact that the reduction of traffic on the Dublin Road would be beneficial to estates such as Monread Estate, the Gallops, Roseville, Kingsfurze, Greenawn and Ashgrove.

It is the recommendation of the Naas / Sallins Transport Strategy that the route for the Gallops Avenue / Naas Inner Relief Road be maintained in the next iteration of the Naas Local Area Plan. Whilst this does not presume a route will be progressed, it retains the alignment as a protected corridor for future examination.

A broad overview of the criticisms of the Gallops Avenue Option and the analysis behind it is presented in Table 5.3 of this note along with Kildare County Council's responses.



Table 5.3: Naas Inner Relief Road Analysis – Criticisms & Responses

Environmental Impact:	KCC Response
<p>"The environmental impact reported in Table 9.2 of RD 1 has been classed as ""Not significant or Neutral"". No evidence has been provided to support this claim. The ""Summary"" in this table makes absolutely no reference to environmental and health implications of this road. The very reason it was rejected previously was because of its negative environmental impact. Such blatant disregard to public health along this route is worrying to say the least. Option 1 (Alt) is a safer option for public health.</p>	<p>The analysis undertaken as part of the Naas / Sallins Study is high level in nature. Should the route be progressed at any stage in the future it would be subject to rigorous environmental assessment including air quality and noise modelling.</p>
<p>In examining Table 9.2, the observations regarding proposed Option 1 Gallops Avenue, there is no reference to the environmental consequences of traffic moving through existing housing estates. While the environmental consequences are FLAGGED Yellow there is no commentary explaining this Flag. This is the same designation as given to the alternate Option 1 which moves through open country with the exception of a small number of isolated houses</p>	<p>The analysis undertaken as part of the Naas / Sallins Study is high level in nature. Should the route be progressed at any stage in the future it would be subject to rigorous environmental assessment including air quality and noise modelling. However, it should be noted that placing a route farther from the origins and destinations it serves does not negate environmental disbenefits and would in fact increase emissions through added vehicle kilometres travelled.</p>
HGV's:	KCC Response
<p>It is also obvious that if RD 1 were to proceed the use of this new roadway as an alternative route for HGV's impacted by RD 5 are not shown in Fig 12.6. For example, a HGV travelling south towards the town centre along the Dublin Road would logically use the new road instead of going as far as the Blessington Road junction. It's a convenient omission!</p>	<p>There is no omission made in this regard. Should a HGV ban be implemented it's would be implemented in the locations indicated in the Naas / Sallins Strategy.</p>
Safety:	KCC Response
<p>Rebranding the 'Naas Inner Relief Road' as the 'Gallops Avenue' does not make it a safer option for those people living along the route."</p>	<p>Noted.</p>



Traffic issues at junctions:	KCC Response
<p>Putting roads such as the Gallops Avenue road through communities, moving the towns problems slightly and I mean slightly further out. Creating similar issues at other junctions on Blessington road and tipper roads makes no sense. Polluting communities seems to be preferable than polluting the town centre like that makes a lot of sense!!! It shows how much the town planners think of its people and their health, wellbeing and safety. Either Cost and or side agreements already made seem to be driving these decisions and eventually people will get to the bottom of it. Viable alternatives that do not displace communities are being rejected such as the alternative to Option 1 and the Orbital Route that do not impact multiple communities.</p>	<p>The analysis undertaken clearly indicated that the Naas Inner Relief Road Option would have the greatest congestion relieving benefit on the Dublin Road.</p>
<p>There are clear hazards associated with the intersection of the Tipper Road and The Gallops Avenue.</p>	<p>This junction would be progressed as a signalised junction to negate any potential traffic conflicts.</p>
<p>(i) Multiple proximate entrance/exits</p>	<p>Noted. Should any scheme be progressed in future such concerns will be examined in detailed design.</p>
<p>If this intersection proceeds there will be six entrance/exit points within 150 metres proximity of this proposed busy junction. Woodlands Estate; St Annes; Tipper Lodge; Beechwood; Former IDA site; Naas racecourse.</p> <p>In no manner could such a proliferation of entrance/exits be acceptable on to what will become an increasingly busy and congested thoroughfare; particularly as many of these would be affected by the traffic at standstill if it is a traffic lighted junction.</p>	
<p>(ii) Visibility at proposed junction</p>	
<p>Heading from Naas the Tipper Road veers left after St Annes and there are no clear lines of sight for any oncoming traffic at this point. This is an obvious hazard and has been identified as such by the Local Planning Authority in the past.</p>	<p>Significant queuing is not predicted at the Tipper Road junction.</p>
<p>(iii) Access/Egress from Tipper Lodge</p> <p>From a personal viewpoint the access/egress to our residence on the Tipper Road will become extremely difficult if the proposed junction proceeds. For example, it will not be possible for us to exit our property if there is a line of stationary traffic queuing across the road at this proposed junction.</p>	



<p>The turning circle out of our gateway necessitates that any car heading towards the town must cross the median of the Tipper Road and this will simply not be possible if there is a line of traffic.</p>	
<p>Repeating previously rejected proposal:</p>	<p>KCC Response</p>
<p>This is a poorly structured and ill thought through roads proposal document with poorly constructed objectives that do not consider the people of Naas at all and I strongly object to how it is being approached especially the Gallops Avenue proposed road which amazingly has been previously rejected and like pulling a rabbit out of a hat is back on the table under a different name.</p>	<p>This statement is not accepted. A state-of-the-art traffic model was developed and utilised to assess available road options.</p>
<p>"The draft strategy refers to the "Naas Inner Relief Road," a proposal which was rejected last year by Naas Municipal District.</p>	<p>Noted.</p>
<p>The draft strategy fails to address how the issues that led to this proposal being rejected last year would be resolved.</p>	<p>Refer to Explanatory Note in Section 4 of this Report.</p>
<p>The 'Gallops Avenue', aka 'The Naas Inner Relief Road' was comprehensively rejected last year by six of our seven Naas Municipal District Councillors. It is most disappointing to see this rejected proposal included in this draft report. Can we please have an alternative that will likely have the backing of the whole community in the final report. The rebranding of the option is also a little less transparent than one would expect."</p>	<p>The traffic analysis has clearly shown that the outer relief road option is not the optimal solution. A bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.</p>
<p>It is difficult to understand how the decisions of Naas Municipal District in June 2019 regarding the deletion of the Naas Inner Relief Road from the current Naas Local Area Plan, and the views expressed by the Planning Regulator in his communication on the draft of the new Naas Local Area Plan, withdrawn from the Council as result of the views expressed, have not been taken into account.</p>	<p>The Naas Inner Relief Road was not deleted from the Naas Local area Plan. A Part 8 planning application was not approved by the Local Members.</p>
<p>Will not be a long-term solution:</p>	<p>KCC Response</p>
<p>- The spending of public funds on a road based on a 26-year-old plan just does not make sense. We need to look at the bigger picture and plan for the Naas we want going forward not a temporary fix. The road will not accommodate all the new housing that is currently planned for the Naas area.</p>	<p>The traffic analysis has clearly shown that the outer relief road option is not the optimal solution. A bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.</p>



<p>According to an article in the Leinster Leader Cllr Fintan Brett, who supports the road, believes that an outer ring road is required for Naas, but this project is needed in the short term. Why? He's saying that this road is not going to be adequate for Naas going forward. What are we wasting public money?</p>	<p>Retaining a corridor for the outer relief road is a long-term objective. This is necessary to protect a corridor should Naas grow significantly in the future. However, population growth in Naas and Sallins is now significantly constrained under the requirements of the National Planning Framework and Regional Spatial and Economic Strategy.</p>
<p>Outer ring road would be a better long-term solution for Naas</p>	<p>The traffic analysis has clearly shown that the outer relief road option is not the optimal solution. A bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas. Two independent reports undertaken by independent consultants have reached this conclusion.</p>
<p>An example of non-comprehensiveness in the report is in relation to population. Page 11 merely outlines that the Census 2016 provided a population of Naas of 21,393. There is no analysis or comprehensive evidence provided as to the future population of Naas. Future projections from now to 2035 should have been provided in order to 'anticipate future problems in the transport network'. Naas is projected to become one of the largest towns in Ireland, which means that it needs an Outer ring road or some form of orbital ring road. There was no analysis in the report either of the vastly increasing environs of Naas, which puts pressure in terms of traffic on the town each day.</p>	<p>The population growth in Naas and Sallins is now significantly constrained under the requirements of the National planning Framework and Regional Spatial and Economic Strategy.</p>
<p>Page 16 outlines that this strategy has prepared a detailed transport assessment. I completely disagree. In order to have a detailed transport assessment, the report should have detailed information regarding population projections, employment projections, infrastructure projections etc. From this, estimates should have been made for car, van and HGV traffic from 2021 to 2035. There isn't an iota of this in this draft report. Personally, I wouldn't even consider this as a draft strategy. All sections, apart from the summary, need to be completed before you could call it a draft, in my opinion. At present, there are 3 Appendices, a Section 9.7 and a Section 11 missing.</p>	<p>Detailed appendices will be provided in the final report.</p>



Impact on Residents:	KCC Response
<p>I and my family have always enjoyed the amenities the racecourse has had to offer. The road would in effect cut me and many other residents off from the Racecourse, requiring residents to negotiate a very busy road.</p> <p>Noise and dirt and light pollution that is very harmful to every resident along the route. It will affect our basic right to enjoy our homes.</p>	<p>The objective of the scheme is to provide congestion relief to the Dublin Road corridor. Whilst its accepted that there would be additional traffic on the Gallops Avenue / Naas Inner Relief Road the analysis has not indicated that there would be extensive queuing and negative impacts for residents.</p> <p>The route would also provide improved pedestrian cycle and public transport linkages to Naas to the benefit of residents.</p>
<p>There is absolutely no doubt that The Gallops Avenue will have a detrimental impact on our current standard of living. In particular it will have a very detrimental impact due to noise, wind, dust, vibration, traffic fumes, light pollution and will significantly reduce the general amenity value of our residence. Currently our road is a relatively quiet, tranquil road which is pleasant for walking, cycling and stopping for a chat with neighbours. This will be lost by the imposition of a busy traffic-lighted junction with cars and tracks accelerating and braking and will greatly add to the noise of the locality. One only has to look to the Blessington Road to envisage how a busy, noisy thoroughfare can substantially damage the quality of the immediate environment. Much of that traffic, particularly the large articulated trucks to/from the quarries at Punchestown will now be routed onto this new road.</p>	<p>KCC Response</p> <p>An extensive range of traffic counts were undertaken by Kildare County Council in 2018 for the purposes of use in the Naas / Sallins Transport Study. These counts were undertaken in line with industry best practice.</p> <p>This assumption is incorrect. Analysis of traffic counts throughout Naas revealed the AM peak hours to be 8 to 9 and PM peak hour to be 5 to 6.</p>
<p>Local Area Model:</p>	<p>KCC Response</p>
<p>Page 98 outlines that a strategic traffic model of Naas was developed. My understanding is that there was no previous data in Naas and that the traffic modelling is based on 1 traffic survey in September 2018, when the weather was good for the whole week. Based on the data gathered, projections were made for 2023 and 2030 from my recollection. On week of traffic data is hardly sufficient to provide the ongoing detailed traffic analysis that is required in order to project future traffic flows.</p>	
<p>The peak hours that were used for making this traffic model were 8-9 and 5-6. However, the residents of Naas know that those hours are not peak traffic, so even the hours were not the correct ones. Peak hours are either 6-7 or 7-8 in the morning and 6-7 in the evening, given the extremely long commuting patterns</p>	



<p>Page 99 appears to confirm my suspicions that this traffic model is the same that the last consultants used, which from my recollection was based on 1 week of traffic data in September 2018. This is not comprehensive. On this basis, I'm taking it that Aecom haven't done their own traffic analysis in 2019 in order to build on the 2018 baseline. The withdrawn Naas LAP 2019-2023 is referred to again, but that was withdrawn for a reason. Why would you base anything on a withdrawn report? This doesn't appear as best practice to me. Surely Aecom should have carried out their own traffic analysis.</p>	<p>An extensive range of traffic counts were undertaken by Kildare County Council in 2018 for the purposes of use in the Naas / Sallins Transport Study. These counts were undertaken in line with industry best practice. The Consultant's for this transport strategy, AECOM created a new strategic traffic model, using different software than was used as the basis for the NIRR analysis and this model is completely independent of the previous traffic model.</p>
<p>Outer Ring Road Option:</p>	<p>KCC Response</p>
<p>What I find quite incredible is the analysis on page 104, where Option 1 Alt would divert less traffic than the Naas Inner Relief Road. No comprehensive data has been presented for that perspective. I don't believe it for a second. Drivers would want to divert away from the Dublin Road and the Blessington Road as far away from the town centre as possible.</p>	<p>The traffic analysis has clearly shown that the outer relief road option is not the optimal solution. A bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.</p> <p>Two independent reports undertaken by independent consultants have reached this conclusion.</p>
<p>Page 112 talks about the Outer Ring Road which is what Naas badly needs. As outlined, because the main objective of this report does not look for optimal road solutions for Naas, it ends up with a current 30-year proposal, which will be 40 years at the time of implementation. What strikes me is that just down the road in Sallins, a Sallins bypass is being built which must be 1 to 1.5 miles outside the town. On the basis of what Aecom has provided, the Sallins bypass would have limited impact on Sallins, when in reality, everyone knows that it will completely alleviate through traffic in the town.</p>	<p>The traffic analysis has clearly shown that the outer relief road option is not the optimal solution. A bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas.</p>
<p>The figures for the Outer Ring Road on page 119 don't make sense as if this was the case, how would the bypass of any town ever get the go ahead. Residents know that this is the optimal solution for Naas and is required as Naas becomes one of the largest towns in Ireland in the future. If the Outer Ring Road would have such a minimal effect as outlined in this report, why then does it rank higher in Figure 9.3, than the new Naas Inner Relief Road in terms of impact on town centre traffic levels?</p>	<p>The traffic analysis has clearly shown that the outer relief road option is not the optimal solution. A bypass of the town would be beneficial if most of the traffic through the town was "through traffic". However, this is not the case in Naas. In Table 9.3 in the report, it shows the Outer Orbital Route ranking higher than the NIRR in terms of traffic reduction. However, it should be noted that the traffic reduction referred to in this table is for a number of roads into and around Naas, not just the Dublin Road and Main Street. The main objective of the NIRR is to relief traffic on these roads</p>



	specifically. Analysis clearly shows that the OOR performs significantly worse than the NIRR in this regard.
Pg 119: There's a reference to a Figure 9.8 on this page, but it must be incorrect as 9.8 refers to a Millbridge proposal	Noted. Aecom to address typo in final draft.
MCA:	KCC Response
Pages 116 and 117 provide scant details of an MCA with no detailed analysis or data provided in order to back up the colour codes chosen. Again, this is far from comprehensive and it is just not good enough. We need to see all of the data and analysis involved in order to scrutinise it fully. Option 1 alt and the Outer Ring Road would prove to be better options were a full and considered Cost Benefit Analysis carried out. Such an analysis would rule out the Naas Inner Relief Road as the monetary savings from emissions, time and congestion would be non-apparent. In fact, the Naas Inner Relief Road will bring more congestion due to the inclusion of the road to Monread at the Gallops junction. An Outer Ring Road would bring the alleviation necessary, so that people would feel safer to walk and cycle. Again, this is a flaw of the Naas Inner Relief Road as parents will be more reticent to allow their children to cycle within a few feet of thousands of vehicles. The racecourse area of Naas needs to be preserved as a quiet and serene area for recreation and amenity. Finally, all of the relevant data and analysis needs to be provided regarding this MCA, as the details scant in the report, in my opinion.	Refer to Explanatory Note in Section 4 of this Report.
HGV's:	KCC Response
Page 118 talks about a town centre HGV restriction, but it's ok for the Naas Inner Relief Road to have thousands of HGV's pass by per day from the numerous quarries that are out in the Blessington side of Naas.	The analysis has not indicated that there would be thousands of HGV's on the Naas Inner Relief Road / Gallops Avenue.



6.0 Millbridge Street

6.1 Introduction

As part of the Naas/Sallins Transport Strategy, a number of road transport interventions were examined. The purpose of these roads interventions is to improve traffic conditions on the overall Naas / Sallins road network. This will ultimately support the implementation of public transport, walking and cycling proposals.

One of the proposals examined was Millbridge Street. This proposed option connects the Old Caragh Road to Millbridge Way. This option would provide greater access between the R409 Caragh Road and the R407 Sallins Road and would require a crossing of the canal. This option was chosen to support east-west movement of vehicles from future developments in and around the Naas Harbour area. This will support a reduction of traffic on the Newbridge Road and Naas Main Street which will allow for improvements in cycle infrastructure and public realm upgrades in the town centre.

An indicative alignment of the proposal is illustrated in Figure 7 below.



Figure 7: Millbridge Street – Indicative Route



6.2 Testing Methodology

In order to assess the potential benefits of Millbridge Street, a state-of-the-art local area model (LAM) was developed in the software VISUM version 18.02-13. VISUM is a comprehensive strategic traffic and transport planning package used around the world to assess new infrastructure, traffic management changes, local plan forecasting, economic analysis etc.

The starting point for the development of the Naas/Sallins LAM was an extract (or cordon) taken from TII's National Traffic Model. This cordoned model was then updated to reflect all roads of strategic importance in Naas/Sallins area and zone structure was refined to reflect the intricacies of traffic movements in the Naas/Sallins Area. Detailed updates were made to the model network to reflect traffic signal timings, link and junction geometries and capacities and traffic loading points.

The model was then fully calibrated and validated in line with the requirements of TII's PAG Unit 5.1 Construction of Traffic Models.

An extensive range of traffic data, collected in 2018, was used to ensure the model accurately reflected existing conditions. The traffic data included link volumes, junction turning movement counts, journey time data and traffic origin/destination information. The model was shown to achieve full calibration and validation criteria requirements for link flows, junction flows and journey time data and as such it is a robust and reliable tool to undertake comparative assessment of future road transport interventions in the Naas/Sallins area.

6.3 Analysis Results

The following section outlines the results of the analysis for Millbridge Street. The scheme was analysed in the base year of the traffic model 2018, and in two future year scenarios, 2023 and 2030. The forecast planning data to estimate demand in the future years 2023 and 2030 was supplied by Kildare County Councils Planning Department and sense checked against forecast data from TII's National Traffic Model.

Table 6.1 below outlines the results predicted by the Naas/Sallins LAM for Millbridge Street tested in the AM and PM peak hours. It can clearly be seen from the tables below that the Millbridge Street option offers significant congestion relief to Newbridge Road and Naas Main Street.



Table 6.1: Millbridge Street Local Area Model Results

Local Area Model Scenario	Percentage Traffic Reduction on Newbridge Road	Percentage Traffic Reduction on Naas Main Street
2018 AM	11.85%	12.4%
2018 PM	15.40%	12.7%
2023 AM	7.09%	8.9%
2023 PM	14.83%	9.1%
2030 AM	5.10%	3.2%
2030 PM	22.61%	10.0%

Figure 8 below shows graphically the congestion relieving benefit provided by Millbridge Street. The figure shown is referred to as a difference plot, and it compares the reduction of traffic on existing roads in **blue** and the transfer of traffic to other routes in **red**.

Figure 8 shows the traffic reassignment impacts (i.e. the re-routing of traffic) as a result of this proposal in the 2023 PM Peak Naas LAM. The figure shows a reduction in traffic (reduction in traffic is shown in blue) on the R445 Newbridge Road and R445 Main Street as traffic re-routes to the proposed scheme (increase in traffic shown in red).

These results show that Millbridge Street would facilitate east-west permeability. This would not only benefit drivers but would be used as a pedestrian and cyclist route also.

From the difference plot, it is also evident that this roads proposal would move some traffic away from the Millennium Park Ring Road. This is not a desirable impact. However, there are significant positive impacts of this roads proposal which are evident from the analysis. In particular, this road would ensure efficient east-west movement of traffic for new developments in the Harbour Area. It will also reduce traffic along main arteries into Naas Town. This would facilitate the implementation of active mode and public realm objectives.

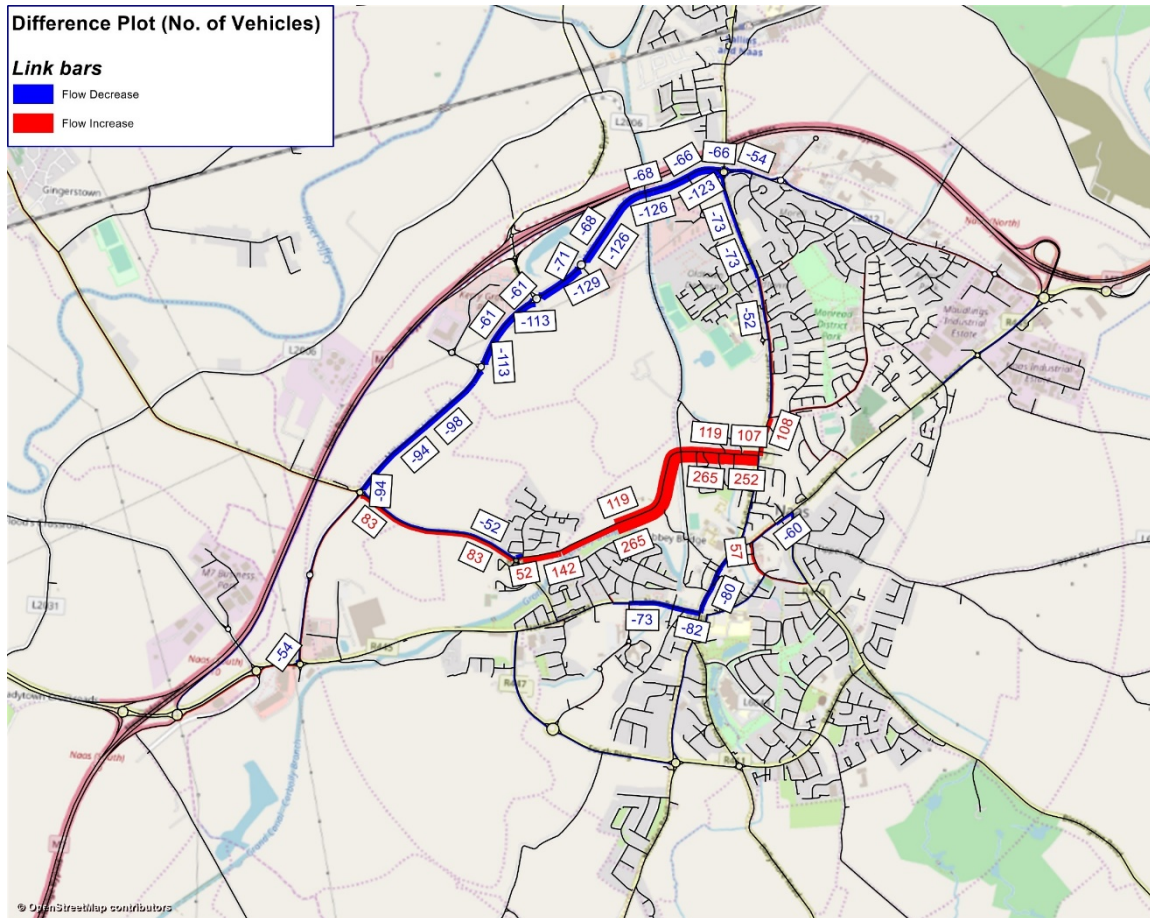


Figure 8: Millbridge Street Difference Plot

6.4 Summary of Analysis & Conclusion

As can be seen from Table 6.1 and Figure 8, it is clear that Millbridge Street has many potential benefits to the town of Naas as it removes traffic from the congested Main Street and Newbridge Road.

As a public body Kildare County Council is bound to comply with the Public Spending Code (PSC) and the Common Appraisal Framework for Transport Projects and Programmes (CAF). These guidelines stipulate that all available options to achieve a transport objective, in this case removing congestion from Newbridge Road and Main Street, should be comparatively assessed using a Multi Criteria Analysis approach to establish which of the available options delivers the greatest value for money.

Such an approach has been taken in Naas / Sallins Transport Study and it is concluded that Millbridge Street would deliver on these objectives. However, as explained in Section 4, Explanatory Note, at the project appraisal stage, this proposal would be assessed again, in more detail. At this stage, alternative options to achieve the same goals would be examined in detail.



Significant objections were noted in relation to this proposal from residents living around the proposed route. Kildare County Council notes these objections and have reviewed them as part of the consultation process. Table 6.2 outlines the main objections raised and Kildare County Council's responses. Please note that this table does not answer every single submission but rather highlights the main themes which were raised by the public consultation.

The detailed analysis of this route leads to the conclusion that this roads objective would be beneficial to the town of Naas. As such, it is recommended that the indicative route is included in the next iteration of the Naas Local Area Plan. At a minimum this route should be preserved to provide access for public transport, walking and cycling. Private vehicular use of this route would be subject to further detailed analysis during project appraisal.



Rejected Previously	KCC Response
<p>“A detailed engagement in 1998 and the following number of years removed this from Naas Town Plans following major mobilization of the views of users of the Canal area. Very significant public support for the removal (and subsequent removal of roads leading to site on both sides of the Canal) as well as a unanimous vote by the then Naas UDC elected representatives for its removal.”</p>	<p>Kildare County Council are aware of this. Please refer to the Explanatory Note in Section 4 of this report.</p>
<p>Traffic Issues:</p>	<p>KCC Response</p>
<p>“The junction of Mill Lane and Sallins is another that will come under renewed pressure. At rush hour, exiting from Mill Lane onto the Sallins Road is already difficult as it is not a traffic signal controlled junction. Increasing traffic from Mill Lane will further add to the hazards and associated risks at this junction. Additionally, it will create further risk “red spots” at the Mill Lane estate feeder road junctions with Millbridge Way from the new RD3 road. Similar issues will be faced by the residents of Finlay Park, Caragh Court, etc., not to mention the potential issues that will result at the crèche on the Caragh Road.”</p>	<p>Concerns over traffic issues are noted. Please refer to the Traffic Modelling Reports contained in the Appendices of the Transport Strategy Report. In addition, please see Section 6.3 of this Submissions Report and the VISSIM micro-simulation section of the main Transport Strategy Report for further analysis on Millbridge Street which was not included in the Draft Naas/Sallins Transport Strategy report for consultation.</p>
<p>“The Sallins Road is one of our traffic black spots in Naas. Even with the completion of the under construction Sallins by-pass, that will not change. Adding to this creates increased risk at both ends of the estates joined and does little to encourage means of transport other than private cars. It will create a “rat run” between both areas with residents from both facing increased risks. Finally, it will de-prioritise the existing access to the canal via Mill Lane.”</p>	<p>These concerns would be examined in detail if the project were progressed. In addition, please refer to the Explanatory Note in Section 4 of this report, which explains that a number of options would be considered at Project Appraisal stage.</p>
<p>“The modelling provided is extremely limited and the underlying assumptions are not provided. In the table 9.9 for instance, no figure is given for the increase in traffic from Millbridge Street turning right onto the Sallins Road – if they can get onto the road at the time - in the direction of Poplar Square even though the road is coloured red to indicate an increase in traffic? Similarly, the main thoroughfare in Monread will be affected but no traffic volumes are provided for local residents to assess its impact on the area, which would be severe.</p>	



<p>This new road will certainly encourage greater car usage, particularly to access St Mary’s school and the Poplar Sq. area, yet the modelling does not indicate the impact. This is a material oversight.”</p>	
<p>“The traffic reassignment impacts of this proposal which are illustrated in the 2023 AM Peak Naas LAM in Figure 9.9 shows a reduction along the Millennium Park Road, R407 Sallins Road and R445 Main Street as traffic between Carragh and Naas now has a direct connection to the Sallins Road. This illustration also shows but does not mention an increase in traffic from the Mill Lane Sallins Road Junction, heading towards Sallins, and the Sallins Road Junction with Monread Heights Road. As anybody who travels out the Sallins Road in peak AM traffic will tell you, traffic is backed up along the Sallins Road from the lights at Scoil Bhríde down to the lights at Sallins Road/Monread Heights Junction. Therefore, additional traffic from the new (RD3) Millbridge Street will further exacerbate the traffic problem and consequently push traffic further in along the Sallins road towards Main Street.”</p>	
<p>Impact on Estates and Residents:</p>	<p>KCC Response</p>
<p>“The roads strategy to build a bridge over the canal (see map 107) is not beneficial for either the residents of mill lane nursing home or the residents of the mill lane estate as it would bring in huge volumes of traffic into a quiet estate.”</p>	<p>The objective of the scheme is to provide congestion relief to Naas Main Street and to provide east-west connectivity through the town. Whilst it is accepted that there would be additional traffic in the vicinity of the estates along the route, the analysis has not indicated that there would be extensive queuing and negative impacts for residents.</p> <p>The concerns raised would be considered in detail during project appraisal where multiple options would be examined (Refer to Explanatory Note in Section 4 of this Report.). It is envisioned that at a minimum, this link would cater for pedestrians, cyclists and public transport.</p> <p>Improved pedestrian cycle and public transport linkages to Naas would be to the benefit of residents.</p>
<p>“The proposed road would run through the quiet residential Millbridge Way and Mill Lane housing and would create a risk and danger to young families and elderly residents who play, walk and generally enjoy the amenities of the estate.”</p>	
<p>“The proposed road would also increase pollution and noise in the Mill Lane and Millbridge Way housing estates adding to the discomfort of the residents.”</p>	
<p>“Such a route would also result in a huge increase in vehicular emissions in residential areas such as Finlay Park. In addition, this will result in increased noise from traffic passing through the housing estate. Furthermore, the risk of traffic accidents and collisions would thereby be increased significantly.”</p>	
<p></p>	



<p>“The estate will no longer be a private space, but the through traffic will lead to increased risk of crime. The value of our properties will decrease instead of being allowed to mature as a private and safe state to live in, which is the ideal when we have easy access to the vibrant town that is Naas.”</p>	
<p>“Both Options - 3 and 5 would result in a large volume of “school run traffic,” which would represent a detrimental effect to the quality of life for the residents of Finlay Park. This would be owing to the inevitable significant volumes of traffic moving to and from the Sallins Road (Scoil Bhríd, Mercy Convent Primary and St Mary’s Secondary), as well as, Millennium Park Road, where Naas Community College is currently under construction.”</p>	
<p>Environmental Impacts:</p>	<p>KCC Response</p>
<p>“The piece of land between Millbridge Way and the canal was dedicated as a wildlife sanctuary several years ago. In my view the Council have failed to protect that sanctuary by not securing that land which has slowed persons to walk through and often frequent it for drinking parties and littering. That land should be protected and managed properly by the Council.”</p>	<p>The analysis undertaken as part of the Naas / Sallins Study is high level in nature. Should the route be progressed at any stage in the future it would be subject to rigorous environmental assessment including air quality and noise modelling.</p>
<p>“The traffic, bridge across the canal would ruin the only remaining amenity in the Centre of Naas and would destroy a large swathe of natural woodland / parkland in the area.”</p>	
<p>“Walkers use the estate as part of their Sli route and residents of the nursing home also use the space within Millbridge Way to walk and converse. The area is already considerably overbuilt and the green space to the canal side of the estate represents a green lung in terms of handling emissions from some of the heavy traffic routes in the area.”</p>	
<p>“The environmental effects of constructing roads as envisaged under Option 3 and Option 5 would also be very serious. Finlay Park is surrounded by farmland, wetlands and woodlands. Building an additional road parallel to the Grand Canal and Millennium Road would destroy habitats containing a wide diversity of wildlife including water birds and ducks. Habitats containing egrets, herons, buzzards, sky larks, pheasants and many native mammals are also to be found on lands in the environs of Finlay Park.”</p>	



Not compliant with DMURS:	KCC Response
<p>"It promotes the use of cars over all other means of travel through a de facto rat run. It will also highly likely lead to a 'frontage free' road which the guidelines states are not recommended as 'they can be unsafe for pedestrians'. If frontage free roads are not deemed suitable for able-bodied pedestrians it does not bode well for disabled citizens."</p>	<p>This would be examined at detailed design stage, but any new route would be compliant with DMURS.</p>
<p>"This proposed road will lead to a higher volume of cars through estates. The draft transport strategy noted in its survey that 62% of people felt it was unsafe for children to bike to school due to traffic. It is counter-productive to increase traffic volumes directly through estates."</p>	<p>Any new route would provide high-quality cycle and pedestrian paths.</p>
<p>"The DMURS section 3.4.4 states that inner relief roads are 'generally used to divert traffic within an urban area, away from a Centre or Node'. The proposed road would divert traffic from a relief road (Caragh road) and direct it through residential areas before emerging on a relief road junction (Sallins road). It is inconceivable how this road would benefit the relief of traffic in Naas."</p>	<p>Please refer to the Traffic Modelling Reports contained in the Appendices of the Transport Strategy Report. In addition, please see Section 6.3 of this Submissions Report and the VISSIM micro-simulation section of the main Transport Strategy Report for further analysis on Millbridge Street which was not included in the Draft Naas/Sallins Transport Strategy report for consultation.</p>

Table 6.2: Millbridge Street – Criticisms & Responses



7.0 Stakeholder Consultation - Submissions & Responses

In total, 79 different stakeholders were contacted and requested to submit any comments that they would like to make in relation to the Draft Naas / Sallins Transport Strategy. In total, 33 responded. These are listed in Table 7.1 below.

Table 7.1: List of Stakeholders who submitted comments on the Draft Naas / Sallins Transport Strategy Report

1	TII	18	Crylock Developments Ltd.
2	NTA	19	Glenveagh Homes Ltd.
3	OPR	20	Millennium Properties Ltd. ARUP
4	Iarnrod Eireann	21	Millennium Properties Ltd. RPS
5	Local Link Bus	22	Cairn Homes Properties
6	JJ Kavanaghs Sassabunda Ltd.	23	Viztip Ltd.
7	Gas Networks Ltd.	24	Elsmore Management Co.
8	KCC Roads Planning	25	Maudlins House Hotel
9	Kildare Chamber	26	Edelvale Properties Ltd.
10	Deputy Catherine Murphy	27	Westar Group
11	Deputy Reada Cronin TD	28	Maynooth Cycling Campaign
12	Carmel Kelly and James Lawless	29	Sallins Road Safety Group
13	Cllr. Anne Breen	30	Naas Access Group
14	Cllr. Bill Clear Naas Greenways	31	Naas Mens Shed
15	Cllr. Evie Sammon	32	Naas AFC
16	Cllr. Seamie Moore	33	Sallins Scout Group
17	Applegreen Services Area Ltd.		

The text from each of these submissions is included in the following pages. KCC responses to specific points raised in each submission are included in the column to the right.



7.1 Transport Infrastructure Ireland Submission & Response

TII Submission Text	KCC Response
<p>TII welcomes consultation on the Naas/Sallins Transport Strategy Draft Report and provides the following observations for the Councils consideration.</p> <p>The N/M7 is part of the EU TEN-T Core Network, therefore, there are European and national policy considerations to be addressed to ensure that the strategic function of the network is safeguarded in accordance with national policy and the adopted County Development Plan. The Trans-European Transport Networks (TEN-T) 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. This approach represents National and European policy.</p> <p>In accordance with the principles established in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) 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. Any local transport function that national roads perform must continue to be secondary to the role of these roads in catering for the movement of strategic traffic. In terms of infrastructure provision required to facilitate local development objectives, the DoECLG Guidelines are clear that local transport solutions are required for traffic/trip demand generated by local development to ensure that such requirements can be catered for in a manner that is complementary to and consistent with the strategic transport function of the national road network.</p> <p>The NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035, identified that congestion emerged as a significant problem along the N/M7 from south of Naas towards the M50, mainly associated with the large volume of car-based commuting into the Metropolitan Area. Congestion on the strategic national road network is acknowledged in the Naas/Sallins Transport Strategy Draft Report and the land use build out analysis discussed in Appendix D identifies capacity issues at national road junctions with the full build out of land use zoning designations initially contained in the Naas Local Area Plan, 2019 – 2023.</p> <p>Therefore, there is a need to ensure that congestion and unsustainable private car dependency does not negatively impact and/or undermine the recent Exchequer investment made in the national road network to facilitate strategic road traffic in this area following completion of the M7 Naas to Newbridge Upgrade Scheme, The Council will be aware from assessment and analysis in support of the M7 Naas to Newbridge Upgrade Scheme that the strategic road network in the Naas Area and in particular Maudlins, M7 Junction 9, is sensitive to additional traffic movements being introduced without a full understanding of impact. Similarly, traffic demand at Osberstown and Newhall Junctions (Junctions 9a and 10) needs to be clearly managed.</p> <p>Having regard to the foregoing strategic context, TII welcomes the preparation of the Naas/Sallins Transport Strategy Draft Report. Following a review of the Draft Report, in TII's opinion, consideration should be given to how the following key points are addressed and reflected in the Transport Strategy prior to its finalisation.</p> <p>1. Commuting Patterns</p> <p>Section 2.3 of the Draft Report outlines that CSO data highlights that Naas residents are highly private car dependent with 77.5% of commuters travelling by private car. However, the Draft Report does not appear to discuss the implications of longer distance commuting outside of Naas. As identified above, the NTA Transport Strategy for the Greater Dublin Area, 2016 – 2035, identifies that congestion has emerged as a significant problem along the N/M7 from south of Naas towards the M50, mainly associated with the large volume of private car-based commuting into the Metropolitan Area.</p>	<p>We agree with this comment. The sensitivity of Junction 9 to increased traffic generation in the immediate vicinity of the junction is recognised by the Roads and Transport Directorate. This must be balanced by the need to develop the brownfield sites in the vicinity of this primary approach to the town. The ideal redevelopment would combine lower trip generation of vehicular traffic with a series of quality developments. The Naas / Sallins Transport Strategy (NSTS) recognises the need to find the right balance in the above.</p> <p>The entire sub-text to the NSTS is the need to transfer journeys to public transport both internally within Naas and externally to and from other destinations. The thrust of the NSTS is to push for the improvement of public transport in terms of access and convenience so as to achieve this. However, the commuter traffic can only be moved away from the road network by the development of public transport that has sufficient capacity, a good level of service combined with good quality access and convenience. While capacity and level of service are not controlled by the Local Authority, the NSTS does press for their improvement and offers ideas on how this might be achieved.</p>



TII recommends consideration and further elaboration on issues arising as a result of longer distance commuting from Naas utilising the strategic national road network. Matters to consider should include the pattern of commuting trends from Naas, impacts on the M7, national road, and associated junctions, and planned local transport investment interventions and/or land use proposals to address capacity and/or congestion issues impacting the strategic national road, and associated junctions, as a result of commuting patterns from Naas.

In addition, proposals to address public transport capacity and improved public transport services to serve commuters, while included in the Draft Strategy, are acknowledged to be outside the remit of the local authority to deliver independently. If such provisions underpin the strategy to reduce commuting by private car, or to provide a viable alternative to the use of the private car for commuting, land use scenarios to support the local area plan preparation should acknowledge different circumstances that may exist with the delivery of enhanced public transport services and capacity and a scenario where such capacities are not provided. A commitment to public transport investment from relevant stakeholders may clarify this matter prior to finalisation of the Transport Strategy and thereby inform future land use proposals for inclusion in the Naas Local Area Plan.

2. Analysis of the Impacts of Future Land-Use Proposals on the Capacity of the Road Network It is welcome that the Naas/Sallins Transport Strategy Draft Report includes an analysis of the impacts of future land use proposals on the capacity of the road network contained in Appendix D. The analysis identifies capacity issues at national road junctions with the full build out of land use zoning designations initially contained in the Naas Local Area Plan, 2019 – 2023, and assesses alternative land use scenarios for Naas/Sallins. It will be critical that the Naas/Sallins Transport Strategy fully informs the future Naas/Sallins Local Area Plan land use strategy and that land use zoning and development objectives included in the Local Area Plan safeguard the strategic function of the national road network and associated junctions in accordance with the provisions of official policy. The Naas/Sallins Transport Strategy Draft Report confirms that the land use zoning objectives contained in the future draft Naas Local Area Plan 2021 to 2027 will be assessed through use of the STM (model) prior to the updated draft being published. TII recommends that this commitment should be included as a specific measure in Section 13 Strategy Implementation of the Naas/Sallins Transport Strategy prior to finalisation.

3. Implementation of Road Transport Measures

It is noted that road measure option 5: Northwest Quadrant Link Street is not included in the Draft Strategy as a proposed road measure but is proposed as a bus only link/public transport measure (Bus Priority Option 5: Bus Only Link to Sallins Bypass). TII considers it critical that any such additional links impacting the national road network, including public transport measures, should be fully assessed for impacts to the national road network and associated junctions prior to finalising the Naas/Sallins Transport Strategy. Additional clarifications on such impacts in the Transport Strategy, in this regard, would be recommended and beneficial. In addition, the Council will need to be confident that the link can be delivered and is viable as a bus only link. TII is not aware that this level of analysis nor of the mitigation measures to achieve this have been undertaken at this point.

4. Additional Measures

A segregated crossing of the M7 between Junction 9 and Junction 9a is included as part of Bus Priority Option 1: Sustainable Travel Bridge which proposes the creation of a second bridge linking Sallins and Naas over the M7 reserved for use by active modes and public transport. Structures crossing national roads are subject to separate approvals/agreements and TII Technical Acceptance in advance of development. All structures proposed on the national road network are required to obtain Technical Acceptance from TII in accordance with TII Publications DN-STR-03001. Consultation should be undertaken with TII Structures Section.

Conclusion

TII would welcome the Councils consideration of the above points and clarifications arising being incorporated into the Naas/Sallins Transport Strategy prior to finalisation.

See above

Variation 1 of the Kildare County Development Plan (2017 – 2023) allocates a population growth of 5,866 in Naas and 1,024 in Sallins to 2026. These figures are based on the forecasts from the National Planning Framework. The only alternative to the failure to improve public transport would be the curtailment of the forecast population growth in the town combined with increased development of jobs locally. The National Planning Framework and RSES do not allow for a reduced level of population growth below the forecast outlined above and the Local Authority will always make every effort to develop additional employment in the town.

We note your comments on this point. The Roads and Transport Directorate are committed to working with the planning department in assessing the impacts of the proposals contained in the future LAP through the strategic transport model.

KCC note your comments and fully recognise the necessity to undertake detailed assessment of this proposal. A high-level assessment through the use of the NTA's ERM has been conducted as part of this transport strategy. It is recognised that further detailed assessment would be required prior to any such scheme progressing further. Refer to Explanatory Note in Section 4 of this Report.

We note your comments on this point. Refer to Explanatory Note in Section 4 of this Report.



TII notes that the stakeholder/public consultation period is of a short duration. This is an important comprehensive document which includes recommendations that will influence future land use planning and transport proposals for Naas. It also indicates proposals that may have significant impact on the M7, strategic national road network, and associated junctions in the area. TII consider that such an important document should warrant a longer time for stakeholder/public consideration especially during these exceptional times.

TII acknowledges the Council's invitation to meet to discuss the Draft Strategy, however, with the limited time afforded for consultation and the current demands on resources TII is not in a position to accommodate such a request. However, TII would welcome consideration of the foregoing points. Should the Council be in a position to provide a presentation on the Draft Strategy, including proposals to address the specific matters identified in the foregoing, TII would welcome such an approach.

I trust the foregoing is of assistance in finalising the Naas/Sallins Transport Strategy.

The NSTS is a non-statutory document. KCC gave an initial time period of 4 weeks to stakeholders to review and submit a response (from 22/05/2020 to 19/06/2020). This was extended by a further 5 days until the 24/06/2020, giving a total consultation period of 4 weeks 5 days for stakeholders. Please also note that any submissions received after the end of the consultation period but before the analysis was completed were also taken into consideration. In total KCC received 797 submissions from the public and 33 from stakeholders.

KCC would be agreeable to this suggestion.



7.2 National Transport Authority Submission & Response

NTA Submission Text	KCC Response
<p>Please find below the NTA comments in relation to the proposals included in the non-statutory <i>Draft Naas Transport Strategy</i> which it is understood will inform and feed into the preparation of the <i>Naas Local Area Plan</i>. The following comments are intended to provide feedback on the proposals and to give guidance in relation to NTA policy and projects which may be of relevance to the preparation of the Naas Transport Strategy.</p> <p>1.0 CREATING AN INTEGRATED TRANSPORT STRATEGY</p> <p>It is stated that the Naas Transport Strategy provides an opportunity to create a holistic transport strategy to support the proper planning and sustainable development of Naas and feed into the preparation of the Naas Local Area Plan.</p> <p>The Transport Strategy has been prepared in the context of the recent upgrading of the M7 and the delivery of a new interchange at Osberstown. This will include the bypassing of Sallins. It is envisaged that these roads will provide an alternative route between Sallins and Naas. In this context there is scope to reimagine the functions of certain roads and junctions and to reprioritise the modes which use them.</p> <p>2.0 BUS NETWORK PROPOSALS</p> <p>2.1 Proposed Routes</p> <p>The Strategy includes a number of bus route proposals for the town. The NTA is broadly in agreement with the summary options, in particular Option 1 (blue central spine) and Option 3 (eastern yellow spine). A north-south spine route will serve specific demands in Naas including trips to the town centre, residential locations, the train station as well as providing connectivity to other local towns such as Clane. This route is already being used to a limited extent, but there is scope to better serve the demand if infrastructural improvements were implemented. In particular, there is an opportunity to reprioritise the use of the road space in the context of the opening of the Osberstown Interchange. The existing pressure on the Monread roundabout will be lessened and the importance of this link to public transport, both in terms of bus movement as well as facilitating access to the train station should be realised. Providing one strong north-south link in the town and giving appropriate bus priority should be a key aim of the Transport Strategy.</p> <p>The second route, the eastern yellow spine, provides linkages to the train station, the town centre and the hospital for the residential population. In the context of the Osberstown interchange and the reprioritising of the Monread roundabout and the Sallins Road, it is not considered a requirement for the proposed additional bridge over the M7 which forms part of this route and the delivery of any such future project should not delay the prioritisation of this route in the short term. The proposed Strategy should provide sufficient bus priority and infrastructure at appropriate locations such that the proposed bridge would not be a requirement. Other bus options, such as the white spine, would appear to be long-term future options. At present, there is no population or road infrastructure to support such a proposal.</p> <p>Option 6 Bus Stop Upgrades should also be included as a short-term objective.</p>	<p>In relation to your comments on specific objectives, please refer to the Explanatory Note in Section 4 of this Report. Specific proposals will be subject to detailed multi-criteria analysis where multiple options will be compared. It must be recognised that there are significant width constraints along the Sallins Road, particularly at the bridge over the M7 which will impact significantly on the possibility of reimaging this route. The Naas / Sallins Transport Strategy notes the development of the Sallins to Naas Greenway spur. This spur is unique in that it runs completely parallel to the Naas – Sallins Road for the majority of its alignment. This offers the opportunity to link into residential estates, schools, local GAA complex and the Grand Canal harbour in the centre of Naas.</p> <p>In relation to your comments on specific objectives, please refer to the Explanatory Note in Section 4 of this Report. Specific proposals will be subject to detailed multi-criteria analysis where multiple options will be compared. It must be recognised that there are significant width constraints along the Sallins Road, particularly at the bridge over the M7 which will impact significantly on the possibility of reimaging this route. The Naas / Sallins Transport Strategy notes the development of the Sallins to Naas Greenway spur. This spur is unique in that it runs completely parallel to the Naas – Sallins Road for the majority of its alignment. This offers the opportunity to link into residential estates, schools, local GAA complex and the Grand Canal harbour in the centre of Naas.</p> <p>KCC agrees that objective PT6: Bus stop upgrades should be included as a short-term measure and this is reflected in the Transport Strategy Report.</p>



2.2 Bus Interchange

The NTA welcomes that Option 1 to upgrade the existing Market Square Interchange is the preferred option to be brought forward. The NTA agrees that this central location will bring the greatest net benefit to Naas.

2.3 Bus Priority

As previously mentioned, the Strategy provides the opportunity to assess in a holistic manner for the town, the bus priority measures which would create improved bus services. In order to facilitate the continued sustainable growth of the town, providing an attractive public transport system with increased patronage should be a critical transport objective. The town has an alternative northern circulation route, a partial southern circulation route and will have an alternative route to Sallins as well as the ability to bypass it. In this context, it is appropriate to reimagine the existing road infrastructure at certain locations and to switch the priority from the car to public transport as well as walking and cycling. It should be possible to maximise the use of existing road space, so that additional infrastructure may not be required if the former is delivered. It does not appear that any bus priority measures are proposed along the Sallins Road which will form a large part of the proposed blue bus route.

The NTA welcomes the proposed bus priority options presented in the report. The short-term options including Options 2 and 4 are welcome. The NTA would consider that Option 3 (Left-turn ban on to Main Street should also be brought forward as a short-term option.

We do not consider that Options 6 and 7 should be ruled out of this study. It has not been demonstrated that with the additional pedestrian and cycle measures, the relocation of the school parking and improved bus infrastructure such as the interchange on Main Street, that the use of Corban Lane should be ruled out. As the other measures are brought forward these options may become warranted and help to form a catalyst for increased use of sustainable modes in the town.

At present, there is no justification for Options 1 and 5 that would warrant the required expenditure.

3.0 RAIL NETWORK PROPOSALS

3.1 Railway Infrastructure

In relation to railway infrastructure, it is noted that the Draft Strategy presents six options. While a discussion in relation to the various pros and cons of future railway infrastructure is welcome, it is not appropriate at the level of a local transport strategy to rule out any future railway infrastructure options. Decisions in relation to the moving of a train station or the building of additional stations will be made by the NTA in consultation with Irish Rail. The Strategy appears to discount Option 1 (to move the station 1km to the west) based on the MCA, while it brings forward Option 2 (to build an additional the station 2km to west). In the absence of any cost benefit analysis or detailed feasibility studies it is not appropriate in relation to the siting of future stations to rule out any option at present. The NTA would question the validity of the commentary contained in the MCA which claims among other things, that there would be reduced fare revenue as patronage falls. The positive benefits in relation to the siting of a station two kilometres to the west do not appear to be included as positives while assessing the proposal for a station 1km to the west. In summary, the NTA recommends that this section of the report is reviewed to reflect the fact that no decisions regarding railway infrastructure have been taken to date and that all options are open for future consideration by the NTA.

The option to upgrade the existing Market Square Interchange is seen as the preferred option in the short term. In the long term, the Harbour Area has been identified as the most beneficial location. However, as with all projects, this proposal will be subject to a detailed MCA analysis, please refer to the Explanatory Note in Section 4 of this Report for further details.

In relation to your comments on specific objectives, please refer to the Explanatory Note in Section 4 of this Report. Specific proposals will be subject to detailed multi-criteria analysis where multiple options will be compared.

KCC do not agree with the NTA suggestion to move Option 3 (Left-turn ban onto Main Street) forward as a short-term measure. This is because the proposal would suggest the immediate implementation of this option. However, the Local Authority, as Roads Authority considers the completion of the alternative route for left -turn vehicles is a necessary prerequisite to the closure of the left turn lane. Options 6 and 7 have been subjected to detailed transport modelling as part of the transport study and this analysis identified that there was insufficient capacity on the reimagined Corban's Lane to cater for the volume of displaced traffic.

Please refer to the Explanatory Note in Section 4 of this Report.

A high level MCA has been conducted as part of the NSTS. Whilst KCC recognise that it is outside our remit to rule out any future railway options, we feel it is appropriate to lobby for the options that we feel are most beneficial for the future sustainable development of Naas and Sallins. In relation to your comments on specific objectives and the high-level MCA tables, please refer to the Explanatory Note in Section 4 of this Report. Specific proposals will be subject to detailed multi-criteria analysis where multiple options will be compared.

KCC would like to highlight that the entire sub-text to the Naas / Sallins Transport Strategy is the need to transfer journeys to public transport both internally within Naas and externally to and from other destinations. The thrust of the Naas / Sallins Transport Strategy is to push for the improvement of public transport in terms of access and convenience so as to achieve this. While capacity and level of service are not controlled by the Local Authority, the Naas / Sallins Transport Strategy does press for their improvement and offers ideas on how this might be achieved.



3.2 Train Services

The opening of the Phoenix Park Tunnel has greatly enhanced the accessibility of Dublin city centre to rail commuters. Government has recently approved the purchase of 41 no. new carriages to enhance the existing services in the short-term. These are likely to be in commission by 2022. Prior to the delivery of additional fleet there are no short-term plans to extend DART services to Naas. However, it is the intention to significantly enhance services to Celbridge-Hazelhatch when new fleet is available, expected to be by 2025. Enhanced services to Naas may be examined at that stage and as above in the context of station relocation and an enhanced park and ride facility. Naas is now within the LEAP card area.

4.0 ROADS PROPOSAL

In relation to the proposed roads objectives the NTA welcomes the short term objectives including a HGV ban in the town centre and the introduction of a SCOOT system. However, Option 2, to develop Murtagh's Corner should be brought forward as a short-term objective to facilitate the enhanced bus services on the Main Street and the operation of the Bus Interchange. Option 1 (The Gallops Avenue), is supported in order to create an alternative route for vehicular traffic which will in turn allow an improved public transport service through the town centre as well as freeing up space for walking and cycling.

5.0 PARKING PROPOSALS

With regard to the parking options presented, the removal of parking from Main Street and Poplar Square to facilitate enhanced bus services is welcome. It is understood that an alternative site for car parking is sought within the town. While the requirement for a central parking location is understood, it is questioned whether the use of an environmentally sensitive and potential tourism site at the canal is the appropriate location for car parking. We welcome the other short-term objectives including the requirement for Mobility Management Plans for large employers as well as enhanced enforcement in relation to illegal parking. With regard to Park and Ride, the NTA has setup a Park and Ride Project Office who are drawing up a Park and Ride Strategy. The existing parking provision at Sallins Station will be examined in this context and the potential to provide a significant park and ride facility to serve either the existing station location or a new station to the west will be considered. In the interim, as a short-term measure, the NTA has rented 200 no. spaces at Sallins station to meet the existing demand.

6.0 PERMEABILITY PROPOSALS

The appraisal of permeability within the town highlights the constraints and opportunities for access within the town. The Strategy identifies many barriers and presents several proposals in order to enhance permeability within the town to key attractors and to access key corridors such as the greenway. The Strategy has identified barriers to permeability to local schools and how access could be improved. These measures which may appear minor could have the potential to encourage significant mode shift to sustainable modes.

The analysis of the 1km catchment to primary and secondary schools clearly indicates the challenges in relation to barriers to permeability as well as the effect of the location of schools distant to the populations they serve. It also highlights the affect that the proposed permeability measures will have. The analysis of the permeability measures within a 1km catchment of Tesco Extra highlights the potential to improve the use of sustainable modes in the area.

7.0 CYCLE NETWORK PROPOSALS

In terms of the provision of a quality cycle network it is important to ensure that a logical, joined-up and legible network is identified. It is critical that this network includes the central area of Naas, and to work from the centre out. The cycling infrastructure must bring people safely to their destination, not just to the edge of the centre.

Although KCC view Option 2, Murtagh's Corner as a key objective of the transport strategy, KCC do not agree with the NTA suggestion to bring this option forward as a short-term objective. This project will be subject to funding and resourcing constraints and will have to undergo various statutory processes. However beneficial, a timeframe for delivery of 1-2 years is not realistic for such a project. KCC notes the NTA's support of The Gallops Avenue proposal, however we would like to highlight that this proposal has been subject to significant amount of local opposition. We would welcome the opportunity to discuss this proposal further with the NTA.

As before, in relation to your comments on specific objectives, please refer to the Explanatory Note in Section 4 of this Report. Specific proposals will be subject to detailed multi-criteria analysis where multiple options will be compared.



The north-south spine as previously discussed in terms of bus priority should also facilitate a cycle network as well as ensuring that appropriate linkages are provided to access it. The Sallins Road has been identified as a primary public transport corridor to Sallins, Clane and beyond. Likewise, this is identified as part of the primary cycle network for Naas. As such, this area should be prioritised and be identified as requiring the appropriate cycling infrastructure. The Strategy includes some interventions on the southern portion of the Sallins Road (towards Naas), however it mostly has no cycling infrastructure and similarly no infrastructure is proposed on the flyover crossing the N7. In the absence of the proposed PT/Ped/Cycle bridge over the N7 (long-term objective) or the development of the Greenway along the canal, there is no solution proposed to bring residents, school children or shoppers from Sallins to Naas and vice versa in the short to medium term.

8.0 CONCLUSION

The assessments and measures which form part of the Draft Naas Transport Strategy have highlighted the potential to create an integrated transport system for the town. In the context of the recent upgrade to the M7 and the alternative linkages created by the Osberstown Interchange and in order to allow the continued sustainable growth of the town, there is potential to reprioritise the various modes in order to offer alternative attractive modes other than the car. Creating strong walking and cycling networks within the town which create clear, safe and legible paths from residential areas to trip attractors has the potential to encourage these mode choices. Likewise enhancing permeability within the town as well as providing bus priority and enhanced bus infrastructure, will encourage greater public transport usage.

The NTA requests that the rail options are reconsidered such that no options are ruled out, as no decision has been taken by the NTA at this time regarding future rail investment at Sallins.

The NTA would urge that certain specific measures outlined above should be brought forward as short-term rather than medium or long-term measures in order to deliver a mode shift and encourage the use of sustainable modes.

It is presumed that that this non statutory transport plan will inform the Local Area Plan being developed for the town of Naas and Sallins.

We trust that this submission will receive due consideration and help to inform the making of the Naas Transport Strategy.

As before, in relation to your comments on specific objectives, please refer to the Explanatory Note in Section 4 of this Report. Specific proposals will be subject to detailed multi-criteria analysis where multiple options will be compared. As noted in response to point 1, there are significant width constraints on the Sallins Road and the N7 overbridge. These constraints form a significant barrier to the delivery of high-quality cycle/walking infrastructure along this route. The NSTS notes the development of the Sallins to Naas Greenway spur. This spur is unique in that it runs completely parallel to the Naas – Sallins Road for the majority of its alignment. This offers the opportunity to link into residential estates, schools, local GAA complex and the Grand Canal harbour in the centre of Naas. KCC welcome the opportunity the positively liaise with the NTA to expedite the delivery of this key project.



7.3 Office of the Planning Regulator Submission & Response

OPR Submission Text	KCC Response
<p>Thank you for your authority's work in preparing the <i>Draft Naas Sallins Transport Strategy</i> (the Strategy) and for the opportunity to provide stakeholder feedback. In accordance with the provisions of section 31AM of the Planning and Development Act 2000, as amended (the Act), the Office is obliged to evaluate and assess development plans in the context of certain statutory parameters.</p> <p>Acknowledging that the Strategy is a non-statutory plan in terms of the Office's statutory role, the Office provides the following high-level comments and observations for your authority to consider in finalising the Strategy.</p> <p>The Office's submission to the Draft Naas Local Area Plan 2019-2023 raised concerns that the local area plan (LAP) had advanced in the absence of a local transport strategy. In this regard, the Office welcomes the clarity provided on page 11 regarding the Strategy's relationship to the future LAP for Naas.</p> <p><i>'The role of the Naas / Sallins Transport Strategy is to inform the revision of the LAP by providing a comprehensive evidence based approach to the development of road-based and sustainable transport which supports the Council's land-use plans.'</i></p> <p>Consultation and engagement The Office commends the council and its consultants for the comprehensive nature of the study and for the use of different approaches to engage with the community, schools and stakeholders. The Office welcomes the planning principles that support the Strategy and in particular <i>'.. an integrated approach with significant liaison between the transportation and planning departments of the Council will be required to ensure that the car-centric development approaches, which have been prevalent throughout Naas in the past, are not repeated'</i>.</p> <p>The Office encourages continued proactive engagement with schools, transport agencies, the Department of Education and Skills, local businesses and employers regarding the finalisation of the Strategy and the measures contained in the implementation section. In respect of the length of the consultation period which runs from 29th May to 19th June 2020, the Office considers that the council could have had a longer consultation period in light of the circumstances surrounding the Covid-19 pandemic.</p> <p>Regional Spatial and Economic Strategy (RSES) The RSES for the Eastern and Midlands Regional Assembly (EMRA) area was approved by the Members of EMRA on 28 June 2019. The Office notes that the specific Regional Policy Objectives for Naas on page 81 of the RSES have been included in the draft Strategy.</p> <p>In respect of Regional Policy Objective 8.6, Naas is listed as one of the settlements for which Local Transport Plans (LTPs) will be made, and the Office considers that this could be made more explicit in the Strategy.</p> <p>Further, the RSES states that the <i>'...policies, objectives and measures which emerge from the LTPs shall be incorporated into the relevant statutory land use plans pertaining to each settlement.'</i> (Emphasis added) In this regard, the Office considers that there is scope to make this requirement of the RSES more explicit in the Strategy.</p>	<p>KCC notes the OPR's comment. The NSTS is a non-statutory document. KCC gave an initial time period of 4 weeks to stakeholders to review and submit a response (from 22/05/2020 to 19/06/2020. This was extended by a further 5 days until the 24/06/2020, giving a total consultation period of 4 weeks 5 days for stakeholders. Please also note that any submissions received after the end of the consultation period but before the analysis was completed were also taken into consideration. In total KCC received 797 submissions from the public and 33 from stakeholders.</p> <p>We note your comment. This will be reviewed in the final draft of the Transport Strategy Report.</p> <p>We note your comment. This will be reviewed in the final draft of the Transport Strategy Report.</p>



The council is also advised to delete references to outdated terminology i.e. designation of Naas as a Large Growth Town consistent with the changes adopted in Variation 1 to the Kildare County Development Plan 2017-2023.

Sustainability and modal shift

The Office supports the emphasis placed on public transport and green modes and road objectives seeking a reduction in vehicular emissions, and on the need for review of existing plans and designs for roads proposals in the Naas area to ensure that they are still relevant in the context of DMURS and the overall transport strategy goal of sustainability.

While it is noted that section 13.2.1 - *Permeability and Cycling Planning Principles* and section 13.2.3 – *Road Planning Principles* make reference to the Design Manual for Urban Roads and Streets (2013), the Office would like to make the following observations.

In respect of city and county level, the following is stated on page 10 of the manual: *'Local authorities shall facilitate the implementation of the principles, approaches and standards to road and street design set out in the Manual in carrying out their development planning functions under the Planning Code.'*

Since the Strategy will inform the statutory LAP for the settlement of Naas, the Office advises that the Strategy place greater emphasis on the priority given to pedestrians and cyclists in the road user hierarchy set out in DMURS 2019 (s.2.2.2 User Priorities).

Further, the Strategy should clearly acknowledge DMURS 2019 as the relevant design standard for the urban road network within the 60kph and below speed limit zones. It is noted that pages 211 and 212 of the Strategy refer to an earlier version of DMURS.

The Office supports the inclusion of analysis / appraisal of options to improve the various modes of transport and achieve the overall objectives of the Strategy. In this regard, the planning authority should ensure there is adequate consultation with the transport agencies.

The Office considers that the baseline information contained in the Strategy could be used to inform targets for increased modal share for public transport, walking and cycling and emissions reduction targets in the LAP consistent with policy objectives in the forthcoming county development plan regarding the Key Town of Naas. The Office advises that the National Transport Authority, Transport Infrastructure Ireland and the DTTaS may be able to offer advice in this regard.

We note your comment. This will be reviewed and references to superseded plans will be removed in the final draft of the Transport Strategy Report.

We note your comment. KCC would like to highlight that the entire sub-text to the Naas / Sallins Transport Strategy is the need to transfer journeys to public transport both internally within Naas and externally to and from other destinations. The thrust of the Naas / Sallins Transport Strategy is to push for the improvement of public transport in terms of access and convenience so as to achieve this. While capacity and level of service are not controlled by the Local Authority, the Naas / Sallins Transport Strategy does press for their improvement and offers ideas on how this might be achieved.

We note your comment. This was reviewed and updated in the final draft of the Transport Strategy Report.

KCC agrees with this comment. As described in the Explanatory Note in Section 4 of this Report, all future projects will be subject to consultation with relevant statutory stakeholders.

The baseline information will be of assistance in developing targets for cycling and walking and to support the search for appropriate funding. The trans-modal shift to public transport will depend initially on the transport offering and the attractiveness of that service to the commuter. The NTA and other state agencies lead and control the rate of change in public transport. While Kildare County Council seeks to influence the speed and direction of change as it pertains to Naas, it does not control public transport or investment in public transport. While the Naas/Sallins Transport Strategy and the Naas LAP can point and support the effort toward better transport, it is not in a position to deliver the targets set by the relevant Authorities. The level of emissions will be determined, in large part, by the success in achieving those targets.



Strategy principles

The Office welcomes the structure of the Strategy and development of a Strategic Transport Model which will be used to test the impacts of the land use proposals contained within the future draft LAP.

In respect of the planning concepts contained in section 13.2.1, the Office suggests reviewing the wording of the fifth bullet point to ensure it is consistent with the Retail Planning Guidelines (2012). The fifth bullet point states: *'Local jobs, retail and services should be located centrally in the town whenever feasible, to encourage the use of walking and cycling. Retail and services should generally be located in, or adjoining, the town centre and should be prohibited from suburban locations, unless part of planned neighbourhood centres and at an appropriate scale. Generally, high intensity employment uses should be located in central locations in, or adjoining, the town centre while low intensity employment uses (such as logistics and warehousing) should be located in edge of centre or peripheral locations of the town.'*

In respect of the public transport planning principles in section 13.2.2, the Office advises that the council should review the first bullet point which states *'New development should only be encouraged on public transport corridors. The Guidelines define a public transport corridor as a location less than 1km from a rail service or 500 metres from a bus stop when walking on the path network'* to ensure it is consistent with the *Guidelines on Sustainable Residential Development in Urban Areas 2009* and in particular the guidance contained in chapter 5. While the Office supports the focus on residential development on public transport corridors, the intent of the above guidelines is to support higher density development along public transport corridors rather than exclusively restricting new development to public transport corridors. The office suggests reconsidering the requirements of section 13.2.2.

Section 5.11 of the guidelines states the following in respect of density in outer suburban / greenfield sites: *'...Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally.'* While the Office notes that housing densities in Naas are generally low and supports the achievement of higher densities in the forthcoming LAP, the council is advised to review the wording of the second bullet point in section 13.2.2 for consistency with the *Guidelines on Sustainable Residential Development in Urban Areas 2009*.

The N7 / M7 national road is part of the Trans-European Transport Network (TEN-T network). One of the objectives of the National Planning Framework under National Strategic Outcome 2 is: *'Maintaining the strategic capacity and safety of the national roads network including planning for future capacity enhancements'*

The recent upgrading of the M7 including the Osberstown interchange and proposed Sallins bypass provide an opportunity to review the function of certain local roads and junctions and how they could be made more attractive for other modes.

We note your comment. This will be reviewed and updated in the final draft of the Transport Strategy Report.

We note your comment. This will be reviewed and updated in the final draft of the Transport Strategy Report.

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KCC notes the OPR's point in this regard. However, it must be recognised that there are significant width constraints along the Sallins Road which will impact significantly on the possibility of the reimagining of this route. Please refer to the Explanatory Note in Section 4 of this Report. The NSTS notes the development of the Sallins to Naas Greenway spur. This spur is unique in that it runs completely parallel to the Naas – Sallins Road for the majority of its alignment. This offers the opportunity to link into residential estates, schools, local GAA complex and the Grand Canal harbour in the centre of Naas.



One of the key principles in section 1.5 of the *Spatial Planning and National Roads Guidelines for Planning Authorities 2012* is that development should be plan-led and the assessment of land use zoning objectives in LAPs needs to be mindful of the need to protect the strategic function of national roads. Having regard to the above, the Office requests that the council review the road planning principles in section 13.2.3 to ensure that there is sufficient emphasis on protecting the strategic function and maintaining the efficiency of national roads which will have a bearing on the land use zonings in the forthcoming LAP.

Summary

As outlined in section 1.1, the preparation of this *'multi-modal strategy will provide a blueprint for transport investment within Naas/Sallins and its surrounds which will support the delivery of sustainable development and the regeneration of the town centre'*. The Office looks forward to reviewing the draft LAP for Naas and is committed to continued positive engagement with Kildare County Council in the implementation of national and regional policies at county and local level.

The Office would welcome an opportunity for a presentation on the Strategy's key findings and recommendations in due course.

We note your comment. Significant reference has been included in Appendix B.2 (formerly Appendix D) in relation to the protection of the national road network. A state-of-the-art strategic model has been created to assess the impacts of land use scenarios on the local and national road network. The Roads and Transport Directorate is committed to working with the Planning Department in KCC to assess the impacts of land use proposals on the function of the national road network.



7.4 Iarnrod Éireann Submission & Response

Iarnrod Éireann Submission Text	KCC Response
<p>Iarnród Éireann (IÉ) welcome the emphasis on rail within the strategy, and the integration of the rail station with other strategy objectives. The principle of identification of rail improvement options by the local authority is also welcomed.</p> <p>However, IÉ note that some of the options identified are outside of the current National Development Plan and current DART Expansion Capital Investment Plans and would therefore require policy and funding support at government level.</p> <p>IÉ do not believe at this stage it is appropriate to rule out any of the future railway infrastructure options, some of which IÉ are currently reviewing. IÉ would therefore welcome sight of the full detail behind the “summary justification” of each option. All identified options should remain a possibility pending detailed feasibility studies and consultations between Kildare County Council, IÉ and the NTA. IÉ have the following high-level comments on each option/MCA, but as stated above the full detail behind the “summary justification” is needed to provide more detailed responses to each option.</p> <p>Option 1 - The assessment appears negative without the detail behind the summary justification provided. The view that patronage would decrease is subjective without Park & Ride size details for example. Economy rating needs further explanation. It appears the opportunity to densify around this location has not been properly captured in access/inclusion. This option shouldn't be excluded without further liaison, investigation and dedicated study.</p> <p>Option 2 - Appears from the economy rating this will cost less than the same facility 800m to the east (Option 1), in theory capital costs for implementation of same facility should be the same, in the absence of any feasibility studies undertaken. We note, again in the absence of any feasibility study, that accessing this site from the new bypass compared to option 1 would need new roads or upgraded roads along the canal which could make option 2 more expensive than option 1.</p> <p><i>Note: Both Options 1 & 2 have challenges with operations and the decision to keep or remove the existing station. This does not appear to be fully assessed. 4-tracking (or passing loops) may be required for both option 1 & 2, but particularly option 2, this doesn't appear to be captured.</i></p> <p>Option 3 - The economy rating of this option is currently on par with option 1 and just above building a 3rd platform (Option 6) at the station which doesn't seem correct. We suggest this requires further review, with potential for all other options to have economy rating downgraded and leave this as top costing option as capital costs here will be relatively high.</p> <p>Option 4 - While some elements of this option will be beneficial for the patrons of the station and may improve passenger experience, we would note it does not provide much in the way of railway growth for the town(s). IÉ note that accessibility groups have been consulted on our nationwide accessibility programme and during consultation this station has not been raised as a concern by the accessibility groups.</p> <p>Option 5 - This option needs further investigation to make a full determination. As a standalone option it would need improved track infrastructure, and probably fleet. Therefore, economy rating would need to be reviewed.</p> <p>Option 6 - States this is required to support the DART option, therefore this should be included in the Option 3 assessment, and Option 3 ratings adjusted accordingly. Removing already limited car park spaces for this option would need to be reviewed further also.</p> <p>In summary, IÉ welcome this strategy and the identification of rail improvement options. All options should remain until further investigation via feasibility studies. IÉ would welcome the opportunity to collaborate and review the findings that assisted in the “summary justification” of the MCA.</p> <p>We trust the above will be considered for review during the completion of the transport strategy. If you have any queries on this submission, please feel free to contact us.</p>	<p>Agreed</p> <p>Refer to Explanatory Note in Section 4 of this Report for all that follows.</p>



7.5 Local Link Submission & Response

Local Link Submission Text	KCC Response
<p>From a transport planning perspective the Draft Strategy is very much welcomed. The proposed integration of the key transport elements is good and is in keeping with the overall goal of the strategy.</p> <p>Strategy Aim 1 - Address current transport issues in Sallins & Naas.</p> <p>One of the principle challenges at this time in relation to both planning and providing efficient public bus services in the environs of Sallins and Naas is the lack of bus priority. Traffic Demand Management incorporating traffic flow will be key to providing the necessary capacity to allow services operate in a manner that excludes them from the constraints of congestion.</p> <p>Local Link Kildare South Dublin currently have 2 proposed services at pre- approval stage with the NTA</p> <p>Service 1 - Allenwood to Naas via Sallins Train Station Service 2 - Celbridge to Naas via Sallins Trains Station.</p> <p>Route Timetables and Mapping is available upon request in relation to these services.</p> <p>Key to the progression of these and future service will be priority.</p>	<p>Traffic Demand Management will be a tool of any transport network where there is adequate public transport capacity and an availability of alternative transport modes within a co-ordinated public transport network. Without these essential elements Demand Management will lead to longer journey times, road network congestion (on alternative routes) and increased emissions due to the longer journey times.</p> <p>The point is noted.</p>



7.6 JJ Kavanaghs Sassabunda Ltd. Submission & Response

JJ Kavanaghs Sassabunda Ltd. Submission Text	KCC Response
<p>The public advertisement invites comments on how the strategy will</p> <ul style="list-style-type: none"> • Make it easier to get around • Support the revitalisation of Naas Town Centre • Reduce negative environmental impacts related to transport <p>A planning application was lodged on 5/6/2020 planning ref 20571 (enclosed relevant drawing number 5152.2.,5152.3, 5152.4, 5152.5) following agreement with J J Kavanagh & Sons to enhance the current bus service by incorporating the proposed additional stops which will have a minimum impact on the area.</p> <p>J.J. Kavanagh & Sons have two bus routes serving Naas i.e. Route 737 and 846. The company operates 50 seater buses- length 12m width 2.5m.</p> <p>The Bus Service 846 runs between Naas - Sallins - Clane and provides frequent town bus service for those travelling to and from Piper's Hill College, KWETB School, Ballycane, Naas Hospital, Naas town Centre, Monread Shopping Centre (Tesco Extra), Sallins Train Station and the town of Clane.</p> <p>The applicants aim is to enhance the current bus service by incorporating the proposed additional stops which will have a minimum impact on the area.</p> <p>It is proposed to enhance this route by including integral residential areas to this route with a Bus Stop at Elsmore Housing Estate (in excess of 300 residences) located on John Devoy Road and to facilitate Castlefarm Housing development (in excess of 180 residences) and Primrose Gardens Estate (in excess of 200 residences) on the Naas Southern Ring Road and Enable Ireland.</p> <p>To facilitate the above, a bus turning circle (Bus Interchange) is required on Naas Southern Ring Road. This interchange will also be used to facilitate Bus-to-Bus transfer in future.</p> <p>The Current Bus timetable for route 846 enclosed has its last bus stop at Piper's Hill College after coming from the Bus stop opposite the Naas Post Office via R448 - Kilcullen Road. With the proposed new stops added, the bus will be turning right onto Newbridge Road R445, then left onto Naas south ring road towards Kilcullen roundabout.</p> <p>The difference in time between the current route and the proposed new one is 7 minutes, allowing 3 minutes for pick up/ drop off at the additional stops and it adds 1.5km to the existing route.</p> <p>With regards to the 737 Naas - Dublin City Centre/Dublin Airport, this route would be extended from Naas Main St to bus bay at the Ring Road via Kilcullen roundabout and returning using the same route with no change to the current stops.</p> <p>This service will be providing fast, frequent and direct public transport for those living in the area and commuting from Naas to Dublin on a regular basis.</p>	<p>This is outside the scope of the Naas/Sallins Transport Strategy.</p> <p>The matter of revision of bus existing bus services and the development of additional bus stops are best addressed to the NTA.</p>



An effective public transport system needs stopping locations that are convenient for passengers, both in terms of journey origins and journey destinations. The selection of bus stop locations that reduce walking times from origins and to final destinations should improve the attractiveness of public transport and contribute to the achievement of the local transport policy objectives.

The area covered by these two routes is included in the Study Area Map of the Draft Transport Strategy.

The Public Transport Strategy seeks to create the conditions necessary for substantial modal shift to take place from the private car to bus and rail services and to improve the effectiveness, frequency and usefulness of existing bus services and to significantly improve bus connectivity between Naas and Sallins Rail Station.

It is submitted that the proposed enhancements to routes 846 and 737 will make a substantial contribution to the foregoing objectives.

Of the seven options considered for a Proposed Interchange, Option 1 is the preferred option which provides for the upgrade of the existing market square interchange as it is shown to provide the greatest net benefits to Naas and makes the best utilisation of recent investment in bus stop infrastructure on the Main street and proposals for local bus routes and bus priority measures will be designed to serve this location on the Main Street.

Routes 846 and 737 use the existing market square interchange and are complimentary to the proposals for market square.

Of the six bus route options considered, the preferred routes are Option 1 Central Spine and Option 3 Eastern Spine.

It is submitted that Routes 846 and 737 are complimentary to Option 1.

The Strategy referred to a minimum standard for each bus stop which should consist of a safe waiting area, a clearly identified bus stop pole and timetable information. Should the Planning Authority decide to grant planning permission, there is no objection to incorporating these standards as a condition to the extent that they are deficient in the planning application.

Finally it is submitted that having regard to Government policy on sustainable development, reduction in carbon footprint, the proposals in the proposed Transport Strategy, these two routes provide a demand led service at present and of course would be flexible to comply with evolving Transport Bus Strategy. The provision of a new bus services to the three large residential developments of Elsmore, Castlefarm and Primrose Gardens and the complimentary role these two enhanced routes will have to the Transport Strategy that these two routes be incorporated in the final version of the Transport Strategy and that the Planning Application be supported.

Noted.

Interchange is being maintained in this location in the medium term.

Noted. These options are selected as preferred measures in the Naas / Sallins Transport Strategy.

Noted.

As Naas continues to develop there will be a need to continually develop and evolve the local bus network.



7.7 Gas Networks Ireland Submission & Response

Gas Networks Ireland Submission Text	KCC Response
<p>After a general review of the Naas/Sallins Transport Strategy it was found that interaction with the GNI gas network will be probable due to the works proposed at the following locations and the type of work outlined below.</p> <p>Sallins Road – Cycle/Pedestrian Path Millbank, Sallins – New Road Abbey Bridge, Naas West – New Road Monread Road – Public Transport / Road Upgrades Morell Way, Naas - New bus-only street Millbridge Street – New Road All Signalised Junction Upgrades All Parking Upgrades</p> <p>The details/exact dimensions of the proposed works for the transport strategy will be required to provide an accurate assessment of the direct impact of the proposed works on GNI's gas network.</p> <p>The strategy has been designed with a proposed timeframe ranging from 1-10 years which includes multiple options for the proposed works.</p> <p>GNI should be contacted once these options have been finalised and provided the associated detailed drawings for a comprehensive assessment of impacts on GNI's assets.</p>	<p>Many thanks for your comments. We acknowledge your points and will contact GNI in relation to all new infrastructure projects when they progress to detailed design stage.</p>



7.8 Kildare County Council Roads Planning Submission & Response

KCC Roads Planning Submission Text	Response
<p>The KCC Roads Planning Section has examined the Naas/Sallins Transport Strategy Draft Report and in general we agree with the contents, analysis and proposals outlined in the draft report, which in our opinion has been comprehensively carried out.</p> <p>We have the following comments.</p> <p><i>Page 59 Interchange Option 4: Derelict Shopping Centre</i> It should be noted that a new developer has now come on board to develop the Shopping Centre where recent site meetings and inspections have taken place between KCC and the Developer's Team.</p> <p><i>Pages 60,61 Option 5 and 6</i> The "bus only street" proposal at the 4th arm of the Murtaghs Corner signalised junction would prevent other vehicular traffic (cars, HGVs) using this 4th arm, where full access for all vehicular traffic would appear to have a bigger traffic impact and more dispersion of traffic on the local road network.</p> <p><i>Page 61 Option 6, Page 81 Bus Priority Option 6 and Page 128 Option 6B Formal School Drop off Area</i> These Options are on lands where a portion of lands at the road frontage was acquired by KCC through CPO for road improvement works on the Corbans Lane and also for adequate room to construct accommodation works which include a retaining wall and an agreement that lands would be handed back by KCC to the Landowner after the accommodation and road works were completed. I would advise that these Options should not be considered.</p> <p><i>Page 126 and 127 Option 6A</i> It should be noted that this Option with access off the Ballymore road is through lands where there would appear to be archaeology to be dealt with.</p> <p><i>Permeability and Connectivity</i> We agree with the improved permeability and connectivity proposals for pedestrians and cyclists which is in compliance with the DMURS standards and would involve minimum and reasonable costs to construct but would result in much improved facilities and better access for vrus. However as discussed previously from our experience there may be some opposition to these proposals from residents and Councillors. The key is good design which include adequate room for vrus, public lighting and passive surveillance measures and which would encourage use by vrus in day and night time hours. It is our understanding that South Dublin County Council have a dedicated Department that deals directly with permeability and connectivity projects for pedestrians and cyclists and has been very effective in getting these projects delivered. I would recommend that KCC should engage with SDCC on this.</p> <p>The KCC Roads Planning Section agrees that for the Naas/ Sallins Transport Strategy to be successful there has to be an integrated approach and significant liaison between the transportation and planning departments of KCC as outlined on page 210 of the draft report.</p>	<p>Noted</p> <p>Noted. It is expected that the left turn ban will only be introduced after the Corbans Lane improvement is complete. The left turn ban relates to east bound traffic alone.</p> <p>Noted. Once the strategy is complete then the objectives of the LAP can be identified and the projects necessary for the implementation of those objectives. When this is complete, the resourcing and programming of projects can begin.</p> <p>Noted.</p> <p>Noted and agreed</p> <p>Agreed</p>



7.9 Kildare Chamber Submission & Response

Kildare Chamber Submission Text	Response
<p>1 INTRODUCTION</p> <p>County Kildare Chamber is the business organisation in Kildare, proactively working to identify and progress developments that are facilitative of economic and sustainable growth. Representing an employer base of 400 businesses and over 38,000 employees across the county, County Kildare Chamber is the largest business organisation in the mid east region of Ireland.</p> <p>Given the significant breadth and depth of our membership, and our representation on various bodies at local and national level, County Kildare Chamber constitutes the representative voice for business in Kildare, a particularly important role given the current economic circumstances in the county and the state.</p> <p>2 GROUNDS OF SUBMISSION</p> <p>This section of the present document sets out the substantive grounds of submission in relation to the draft Transport Strategy. The following subsections address these grounds on a thematic basis and (where relevant) identify suggested alterations to the draft Transport Strategy document for the planning authority's consideration.</p> <p>Transport Investment to Support Economic and Employment Growth</p> <p>Following a period of relatively subdued economic activity and development in the area, the locations to which the new Transport Strategy pertains have been subject to renewed growth, investment, and improvement in economic and social terms in recent years. The jobs ratio in the area has improved and has become self-sustaining (as recognised within the Regional Spatial and Economic Strategy for the Eastern and Midlands Regional Assembly hereafter the EMRA RSES). Naas in particular is a significant employment hub, both for local residents and inward commuters.</p> <p>This is an important and positive trend, which must be sustained and supported. The growth of employment in key towns such as Naas is imperative to reduce and reverse patterns of long-distance (often car-based) commuting from areas within the core region of the EMRA into the metropolitan area of Dublin. While Sallins has also seen employment growth over the corresponding period, such growth has been more muted when compared to the significant population growth in the town (as expressly recognised within the EMRA RSES, page 93 refers).</p> <p>Sallins is identified as a self-sustaining town, with such locations identified as towns that <i>"require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery"</i>.</p> <p>Targeted investment in transport infrastructure is widely recognised in planning research and literature as a key enabler of economic and employment growth, which can also have a major influence on quality of life, human health, and the local and wider environment. The positive externalities brought about by improvements in accessibility and mobility for both urban and rural locations are therefore wide ranging and self-reinforcing. Well-targeted investment in transportation initiatives can support economic growth, which in turn supports future investment in further improvements.</p> <p>County Kildare Chamber considers that achieving future growth aspirations and employment targets must be a core consideration in the policies of the Local Authority in the short to medium term, including the forthcoming Transport Strategy for Naas and Sallins.</p>	<p>The achievement of growth aspirations and employment targets will be a function of the LAP 2021 to 2027. These must be in line with targets from the NPF and RSES.</p>



With this in mind, and having regard to the overarching objective of reducing reliance on private cars (and consequently their resulting carbon emissions), it is respectfully suggested that the Transport Strategy for the area should clearly favour the improvement of public transport, walking and cycling infrastructure in the area over and above increasing capacity for private vehicle traffic, particularly within the existing built up areas of Naas and Sallins. Such an approach is considered to represent a sustainable strategy and also the most realistically achievable one in terms of access to capital, particularly having regard to the Programme for Government agreed in recent days, which predicts a major reallocation in transport investment and funding towards public transport and active transit (walking and cycling).

Many parts of Naas and Sallins are comparatively car-dominated at present and prone to congestion at peak hours. The results of stakeholder engagement and public consultation on the Transport Strategy preparation process to date underline the public desire for a shift away from car dominance and congestion, with strong support seen for active transit improvement and reduction in traffic within town centres.

The Chamber welcomes the measures envisaged within the draft Transport Strategy to improve public transport and active transit infrastructure via targeted investment and spatial intervention. Upcoming infrastructure developments in Naas and Sallins provide the opportunity to create an improved environment where pedestrians, cyclists and public transport are prioritised. Such an environment will be conducive to improved quality of life, encouraging inward investment and fostering economic and employment growth.

From a higher-level perspective, the recognition of the intrinsic (and often overlooked) link between land-use and transportation/ accessibility within the locality can play an important role in the success of the new transport initiatives put forward, by matching appropriate uses and appropriate locations, both within the urban centres of Naas and Sallins and at less central locations better suited to lower-intensity employment uses. The important relationship between land-use and transportation is discussed in further detail below.

In summary, we fully support the delivery of a Transport Strategy which will:

- Reduce through-car movement and traffic speeds in both Naas and Sallins
- Prioritise public transport movement in Naas
- Identify orbital routes to bypass the town centre

Matching Land-Use with Transportation and Accessibility

The integration of land-use and transportation planning in the Naas and Sallins area will be central to address negative transportation patterns (including over-reliance on the private car) and to the achievement of positive outcomes from investment in improved transport infrastructure.

Refer to the Explanatory Note in Section 4 of this Report. The entire sub-text to the Naas/Sallins Transport Strategy is the need to transfer journeys to public transport both internally within Naas and externally to and from other destinations. The thrust of the Naas/Sallins Transport Strategy is to push for the improvement of public transport in terms of access and convenience so as to achieve this. However, the commuter traffic can only be moved away from the road network by the development of public transport that has sufficient capacity, a good level of service combined with good quality access and convenience. While capacity and level of service are not controlled by the Local Authority, the NSTS does press for their improvement and offers ideas on how this might be achieved.



The opportunity arises within the current Transport Strategy to expressly recognise the suitability of certain locations for higher intensity uses (precipitating greater trip generation and best located proximate to good public transport or in central locations), with other locations better suited to lower intensity uses which require a different accessibility profile (for example low-intensity employment uses such as datacentre, industrial, and logistics type uses). Such lower intensity uses are well suited to less central locations that have access to the national road network and are less suited to central locations given their lower density of employees per given area.

It is submitted that the forthcoming Transport Strategy should seek to foster the delivery of highly accessible, walkable and cyclable central areas for Naas and Sallins, while also recognising the potential of locations (for example the environs of Naas to the north of the upgraded Newhall interchange and the Exit 9 entrance to Naas) for lower intensity, space extensive employment.

The delivery of high-technology, space extensive employment development (such as data centre uses) at such locations in the environs of Naas would also foster synergies with the newly established MERITS Digital Hub in the town, while securing vast inward investment and associated high value added employment for the area.

This will maximise the effectiveness of investment in transport improvements, while encouraging the growth of employment in the area.

Encouraging Active Transit

The public transport measures outlined within the Draft Transport Strategy (including bus only streets, new bus stations and bus bays, and public transport interchanges) are welcomed. Likewise, the inclusion of public realm improvements and investment in walking and cycle infrastructure envisaged in the draft strategy document is welcomed.

In the context of the clear and identified need for improved spaces for pedestrians and cyclists, it is submitted that opportunities exist in the short term to immediately implement certain measures at a low cost but which would result in significant betterment for the local population. This is particularly pertinent in the context of the current public health crisis, with reductions to public health capacity on foot of health concerns underlining the need for swift action to avoid a sharp increase in private car use.

A swift move to implement public realm, walking and cycling improvements will help to protect the health of the population and support local businesses in the context of the ongoing public health emergency, and would concurrently improve the amenity and sustainability of the area in the longer term.

County Kildare Chamber, fully supports the key objectives from the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031 which sets out the following key regional policy objectives specific to Naas, many of which directly support the enhancement of active transit in the town:

- "RPO 4.48: Promote the improvement of the transport network within and serving Naas town, including delivery of a robust and efficient walking, cycling and bus network with strong links to Sallins Railway Station, key destinations within the town and to the North West Quadrant and town centre area."
- "RPO 4.49: Support the development of the Grand Canal for amenity, recreation and sustainable transport purposes including the Naas to Sallins and Naas to Corbally harbour greenways and linking these to the national Grand Canal Greenway."

The development of significant land banks on the periphery of the town centre which would be heavily reliant on the National Road Network for access is contrary to planning policy and guidance set out by TII and the NTA and OPR.

The development of significant land banks on the periphery of the town centre which would be heavily reliant on the National Road Network for access is contrary to planning policy and guidance set out by TII and the NTA and OPR.

As detailed in Appendix B.2 of the Naas/Sallins Transport Strategy, the development of the area in the vicinity of the Newhall Interchange has been examined. It has been found that large scale development in this location would exacerbate issues at the Newbridge Road Roundabout and therefore cannot be justified.

The development of significant land banks on the periphery of the town centre which would be heavily reliant on the National Road Network for access is contrary to planning policy and guidance set out by TII and the NTA and OPR.

It is expected that the response to Covid 19 (in terms of traffic movement) will be done over a short period. This strategy has a longer perspective and does not negatively impact on any response to Covid 19.



- "RPO 4.50: Regeneration and consolidation of the historic centre to improve the retail and commercial functions of the town core, with enhanced permeability and sustainable mobility within the town centre and improve links between the core and surrounding residential and employment areas through the further development of walking and cycling routes and improved public transport."
- "RPO 4.51: Strengthen the local employment base including through the development of MERITS, Millennium Park in the North West Quadrant and the regeneration of underutilised lands including industrial lands in the north east of the town."
- "RPO 4.52: Support the delivery of new and enhanced public transport infrastructure in Naas and Sallins, including Park and Ride and interchange facilities as identified by the NTA and Kildare County Council."
- "RPO 4.53: Support an enhanced role and function of Naas as the County town of Kildare, particularly as a hub for high quality employment, residential and amenities."

County Kildare Chamber look forward to supporting the Local Authority in the completion of the LAP 2021-2027 for Naas which will include policies and objectives for movement and transport, walking and cycling, parking, public transport, road and street network as well as strategic road connections.

Noted.

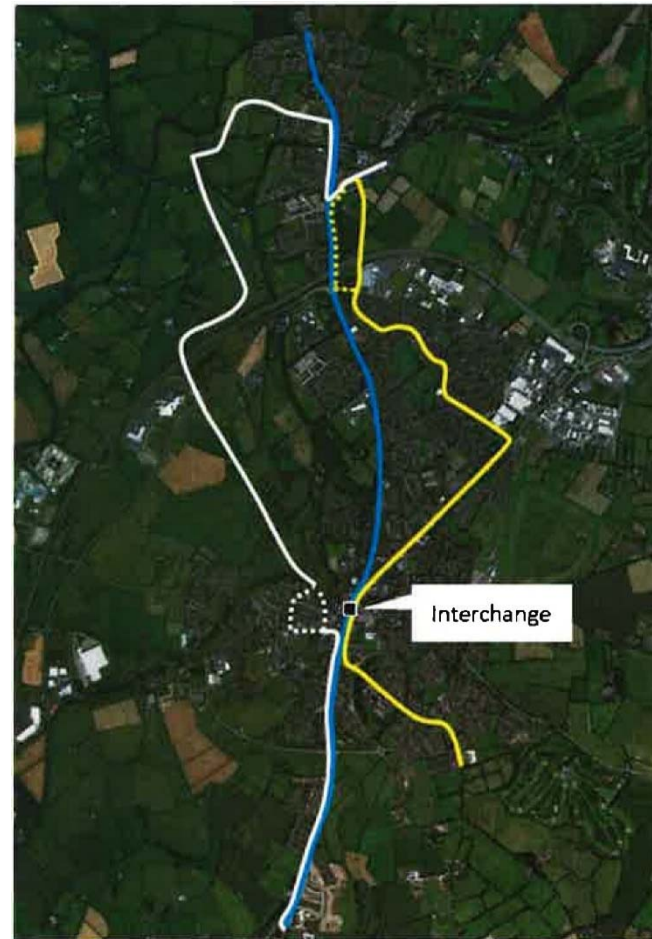
Key Linkages and Addressing Congestion

Section 8.4 of the draft Transport Strategy details bus route options under consideration for the locality. The draft Strategy notes the importance of critical mass, residential and employment density, and the linking of key destinations to support the use and operation of local bus services at a good frequency. Five bus route options are outlined, which include the following options:

- Option 1- A central spine route linking the school complex to the south of Naas with the town centre and onward to the train station.
- Option 2 -A western spine that links the Millennium Park area and the north-west quadrant to the train station and the town centre.
- Option 3 - Eastern spine route which seeks to resolve a public transit deficit for housing estates in the northeast of Naas, also linking to the town centre and train station.
- Option 4 - An east-west link that links trip attractors on the Newbridge and Dublin Roads with the town centre. This route includes a link for the MERITS digital hub and the town centre but does not link to the train station.
- Option 5 -An orbital link, which is a future route that could connect the peripheral areas of Naas including the future development areas identified within the RSES. This route would not serve the town centre or train station.

The draft strategy presents an option analysis and concludes that Options 1 and 3 will be the preferred options carried forward, with Option 2 as a longer-term measure to support the development of the Millennium Park area. An interchange is provided in the town centre.

Figure 1: Extract from Figure 8.17 of the Draft Strategy, illustrating preferred bus routes



Having regard to the options analysis undertaken and the various possible routes considered to date, we wish to suggest an update to the preferred routes identified. It is respectfully submitted that, as a minimum, one of the preferred bus routes to be brought forward under the final Transport Strategy must provide for a connection between Sallins Train Station, Millennium Park, the town centre, and the MERITS digital hub facility. MERITS will attract start up businesses from across the mid- east region and Dublin. It must link with the train station.

As currently indicated, both Options/ routes 1 and 3 provide for an unwarranted duplication of services in the southern area of Naas, following an identical route until the junction of Main Street and the R445, where Option 2 turns westward to serve Millennium Park.

A linkage between the train station, Millennium Park, MERITS, and the town centre is imperative for the development of the area in terms of prosperity and employment growth. The MERITS hub has the potential to be a significant generator of growth and enterprise, as an exemplar technology hub for the mid-east region and the core region of the EMRA. Its success and the fostering of synergies and cluster economies with the existing and future development of the Millennium Park area will be heavily reliant on the provision of strong transport linkages between the two, with ease of access to the town centre and the train station at Sallins also an imperative for these important employment and enterprise nodes. A linkage along this route is important for the successful attraction of foreign direct investment and indigenous enterprise in the area.

A public transport linkage along this key axis would also have a positive impact in terms of reduced car dependency and congestion, both of which have been identified as significant weaknesses for the area within the SWOT analysis conducted for the draft Strategy.

Please refer to the Explanatory Note in Section 4 of this report.



On the basis of the foregoing, the figure below suggests an alteration to route option 2 as currently outlined within the draft Strategy. This alteration will allow for a better overall service provision by the new bus routes, serving a greater usership and servicing all of the key locations on the axis outlined above.

Instead of duplicating the coverage of Route 1 along the central access to the south of the town centre, this alternate route would branch to the west earlier, thereby serving the MERITS digital hub and the surrounding areas, including the Elsmore residential development, the Devoy Quarter, and the offices of Kildare County Council.

Further to this suggested change, it is respectfully submitted that the delivery of Option 2 should not be categorised as a longer term objective but should rather be delivered in tandem with the other two preferred routes.

Route 2 will provide access to significant areas of existing residential development and to existing and future employment land banks. The delivery of this service will allow for the sustainable, public transport orientated development of these locations . It is considered appropriate to put in place this service and infrastructure at an early stage, rather than allowing development to precede public transport provision.

The early delivery of this route will also encourage and hasten the delivery of employment within the Millennium Park area, while also providing the important link between the MERITS hub, the town centre, and the train station.

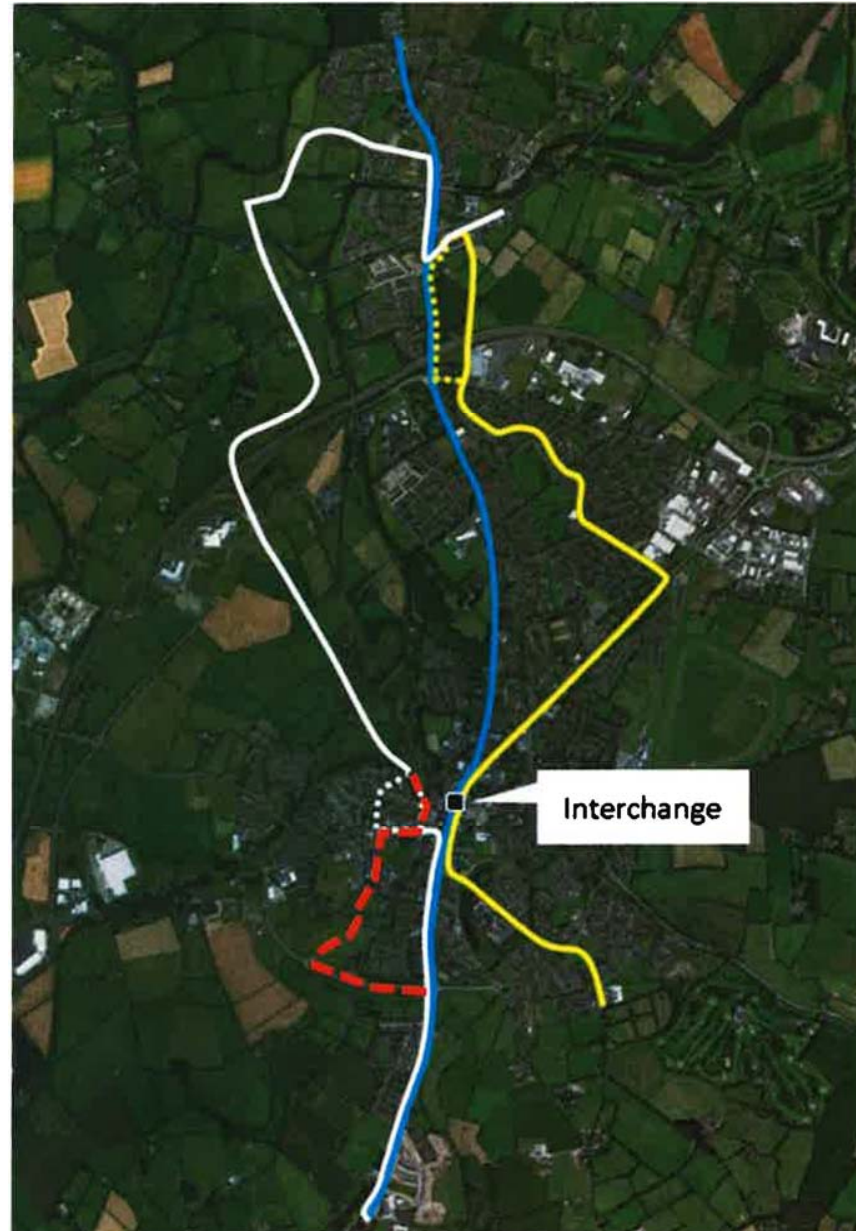


Figure 2: Annotation of Figure 8.17 of the Draft Strategy, with suggested alteration to route Option 2 indicated in red

We recognise and support the priority afforded to congestion reduction within the draft strategy. Congestion is one of the key weaknesses facing the area, and one of the constraints on the sustainable growth and prosperity of both Naas and Sallins. It is important that this issue is addressed in the short term, while providing the alternative means and transport modes to concurrently support wider development.

We support the newly named Gallops Avenue connecting the R410 Blessington Road to the R445 Dublin Road as the most cost effective and most functional link road option available. It is submitted that the other options considered would be less cost effective and would likely be difficult to secure funding for.

Noted.

Other Grounds of Submission Parking Measures



Noting the positive initiatives set out within the draft Strategy to enhance pedestrian and cycle facilities in the area, it is further submitted that a re-balancing of car parking must accompany these measures. The replacement of existing car parking with areas of urban open space and a greater number of street trees has the potential to make the area more welcoming and comfortable for people, enhancing the amenity of the locality for local residents, employees and visitors alike.

Such an intervention will also be key to promote uptake in cycling, walking and public transport - a reduction in car parking would play a considerable role in a successful modal shift.

The importance of measures to re-imagine the role of parking in Naas and Sallins should be highlighted as a more central consideration as part of the final Transport Strategy.

Access to Commercial Estates

County Kildare Chamber questions the need for multiple entrances to commercial estates as identified at Page 210 of the draft Strategy. While the need to foster permeability is acknowledged, for reasons of security, operational requirements, and cost, the provision of multiple entrances to commercial estates is not always a practical possibility. It is respectfully submitted that this fact should be recognised within the text of the final Strategy.

Potential Constraints on Strategy Delivery

There are a number of significant constraints which have been identified by County Kildare Chamber that could impact upon the delivery of the Plan. These include:

- a) Authority resources: a key constraint in the delivery of the plan is the Authority's personnel resources. The level of capital investment and the extent of service development over the period of the Plan require additional personnel resources within the Authority to deliver the Plan's proposals.
- b) Agency resources: within certain agencies will also be needed to deliver the cycling and walking programmes and support the development of the bus network and the various traffic management measures required under the Plan.
- c) Funding: the availability of funding to implement the proposals needed to upgrade the existing transport system is one of the most significant constraints. While an indicative funding profile for capital investment can be sought, the plan once finalised may rely on developer led funding in parts.

4 CONCLUSION

We trust that the contents of this submission will be taken into consideration by the Planning Authority and their consultants during the next stage of the Transport Strategy preparation process. Please do not hesitate to contact us if you have any queries regarding this submission.

Noted. Certain locations which may be beneficial for the removal of on-street parking are identified in the draft strategy. It is noted that where on street parking is being removed this should be counter balanced with parking in alternative locations.

As above.

KCC notes the concerns highlighted here and will work proactively to ensure any such issues are mitigated in detailed design.

Noted and agreed.

Noted and agreed.

KCC will work with funding agencies such as DTTAS, TII and the NTA to attempt to secure funding.



7.10 Deputy Catherine Murphy Submission & Response

Deputy Catherine Murphy Submission Text	Response
<p>I want to welcome the publication of the Naas Transport Strategy which is a timely document given the proposed change in focus at national level towards more sustainable communities. Transport is a key aspect of that.</p> <ol style="list-style-type: none"> 1. Changing the mindset is about changing terminology; we need to think about moving people not about moving vehicles. The transport strategy should accordingly be renamed the Naas Movement Strategy. 2. Transport accounts for almost 20% of CO2 emissions and must be reduced if we are to meet our climate obligations. Achieving a modal shift is critical to that. Therefore, there needs to be much greater ambition expressed in this strategy to rebalance modal split towards walking/cycling and public transport. 3. The proposal for Sallins is disappointing given that it is a young and up and coming town. The opening of the bypass will open new opportunities for safe walking and cycling, with safe routes to school, leisure and retail all requiring greater consideration and linkages with each other. The presence of the Railway station means Sallins offers great opportunities to mix modes and could be used as a best practice model. 4. The strategy needs to contain examples evident in other European countries. The development of good urban walking and cycling networks is commonplace right across Europe. It is reasonable to expect that Naas should have a first-class cycling network put in place over the next decade. The strategy must rise to that challenge. 5. The inclusion of the Gallops avenue is disappointing but not surprising. This has recently been through a public consultation followed by a vote at MD. This area should be developed as a Greenway and would have a more dramatic effect on movement of people in Naas in a more sustainable way. The insertion of an outer ring road is more appropriate and would fulfil the longer term need for Naas. The proposal should therefore be removed and replaced with an ambition to develop the Gallops Avenue as a Greenway. 	<p>Transport by definition is the movement of people or goods from one place to another. It not felt that it is necessary to change the name of the strategy.</p> <p>Refer to the Explanatory Note in Section 4. The entire sub-text to the Naas/Sallins Transport Strategy is the need to transfer journeys to public transport both internally within Naas and externally to and from other destinations. The thrust of the Naas/Sallins Transport Strategy is to push for the improvement of public transport in terms of access and convenience so as to achieve this. However, the commuter traffic can only be moved away from the road network by the development of public transport that has sufficient capacity, a good level of service combined with good quality access and convenience. While capacity and level of service are not controlled by the Local Authority, the Naas/Sallins Transport Strategy does press for their improvement and offers ideas on how this might be achieved.</p> <p>KCC do not accept this statement. The strategy contains extensive cycling and permeability proposals for Sallins. In addition, it proposes a dedicated public transport bridge to link into the train station and significantly improved local bus services between Sallins and Naas. The final strategy will also contain draft public realm improvements for Sallins.</p> <p>The comment is not accepted. The strategy places walking and cycling at the forefront of the change. Nearly 50% of journeys begin and end in the town. The opportunity to shift these to pedestrian and cycle transport is very clearly identified and examined in the strategy. Proposals for the necessary changes to achieve that modal shift are put forward. Some of these are less palatable and will require drive for their implementation. However, the location of development (including schools and shopping) away from the town centre is a significant problem in regard to pedestrian and cycle movement.</p> <p>The strategy document clearly sets out the congestion relieving benefit that the Gallops Avenue would have on the Dublin Road. Delivering such congestion relieve would facilitate the provision of improved Public Transport and cycling and walking infrastructure along the Dublin Road. This would have a major benefit for estates such as Ashgrove, Greenway, Kingsfurze, Roseville and the Gallops. Any development of the Gallops Avenue would include the provision of high quality cycling and walking infrastructure.</p>



6. Covid 19 is mentioned, yet there is a total failure to consider the impact that Covid 19 is having on the design of public space in cities. Auckland in New Zealand for example is implementing radical measures to pilot cycling and walking interventions.

7. The current Program for Government includes significant supportive policy for cycling and walking infrastructure which will be underpinned by very significant budget allocation. KCC needs to be shovel ready for all these projects and needs to be visionary to ensure that what we design is of high quality.

8. Transport Strategy and Development over the next decade: There requires to be a very definite link between land use and transport or movement strategies. Yet the approach fails to consider any scenarios aimed at exploring the likely direction of development over the next decade. One of the core challenges facing Naas is to connect the perimeter development with the core of the town. There is a consensus that this will be largely achieved through the development of the North-West Quadrant. Apart from one major road and a single stretch of Greenway, the strategy is silent on the topic. This seems to indicate a very conservative stance, and a mind-set which seems happy to tinker with the status-quo.

9. Schools: Safe route to schools need to be developed for each school. This has been done under the Naas Neighborhood greenway document and will be more detailed in its feasibility study currently been drafted by consultants.

10. De-Burgh Lands; The cycling and walking proposals, neither short, medium, or long term[S,M,L] connect into the de-Burgh Gardens, which are a public resource achieved through planning gain. It is essential this is addressed by way of amending the strategy.

It is expected that the response to Covid 19 (in terms of traffic movement) will be done over a short period. This strategy has a longer perspective and does not negatively impact on any response to Covid 19.

The point in relation to funding is noted. The programming of projects will be addressed when the LAP is complete as the objectives of the LAP form the basis of future projects in Naas.

The strategy considers that the national and regional policy of development of the central core of the town will be the primary focus of the LAP. Peripheral development will then radiate out from the core. The primary access to that development will be by walking and cycling with public transport providing the primary link to other points beyond the town. Clearly this will take time to achieve and the infill between the town and the peripheral developments will take time. In relation to the criticism of land use policy, please refer to Appendix B.2 of the report.

The Naas/Sallins Transport Strategy does try to respond to the poor siting of schools at the edge of the town. It also tries to connect the schools to the housing estates. The Feasibility study mentioned would be welcome. However, the Naas Transport Strategy is not meant to detail individual projects. It is agreed that it would be preferable to have no drop-offs at schools and the proposals for a drop-off area can be abandoned if the Feasibility study mentioned can deliver a method for their prevention.

Noted. There may be potential to connect the De-Burgh estate to the Naas/Sallins Greenway which forms part of the strategy.



7.11 Deputy Reada Cronin TD Submission & Response

Deputy Reada Cronin TD Submission Text	Response
<p>The Town Link bus service needs improvement. More joined up services and make it commuter friendly. More buses required at rush hour on a scheduled service to cater for train times. Lack of parking facilities in Sallins is a major issue and a better bus service would help alleviate this problem. The Kavanagh's service is running very well. We should be looking to bringing out the Luas line to Naas and/or a park and ride for the Sallins line.</p> <p>I welcome this move to take submissions from the public with the potential to impact so powerfully on people's lives. It's an excellent idea and very much in keeping with Sinn Féin's view of public and community engagement; that local democracy and planning must engage, consult, heed and collaborate.</p> <p>I would like to see the input of the residents of Naas to this question.</p> <p>A park and ride should be considered for Sallins</p> <p>My observations, on behalf of my constituents, relate specifically to the Gallops Avenue aspect so-called. They are largely interconnected. That they are, illustrates how the transport solution in question is neither a discrete development nor a simple infrastructural element in Kildare. Rather, the plan has the capacity to impact, and profoundly, on life as lived in the community.</p> <p>From the level of correspondence I have received, it is clear that large swathes of the community are anxious, even angry. This is understandable. They are wary of a plan imagined and devised at a time - and for a time - that has no connection to the reality of the present, still having the capacity to impact powerfully, upon it.</p> <p>These impacts are of great import in assessing what a community means now when it talks about 'a good life' in the 21st century. This physical plan then, is of profound social, even philosophic, import for the people of Kildare in their modern living and attitudes, expectations and aspirations. In their stated concerns about it, it is clear they do not want to have 20th century standards and vision decide the capacity and quality of their 21st-century life. Which is why public consultation, at this juncture, is so welcome and valuable</p> <p>1 Concerns that the proposed plan risks ignoring local democracy & the civic expectation & aspiration of modern communities</p>	<p>The need to improve the performance of bus services in terms of capacity and level of service is accepted. These are essential to the achievement of a move from private car journeys to public transport. The general thrust of the strategy is to push in that direction. It must be remembered the main responsibility for bus services lies with others but the local authority accepts the need for improvement. The extension of the Luas to Naas may not be feasible or successful. The travel time for a Luas tram from Naas to Dublin City centre would likely render the service too slow in comparison to other forms of transport.</p> <p>The strategy has been put to consultation and will contain an appendix summarising the submissions and these responses. In tandem the main stakeholder's have been consulted.</p> <p>Accepted. The Strategy identifies a possible Park and Ride location in Sallins.</p> <p>The procedures adopted in preparing the Strategy and the statutory basis of Naas LAP involves public consultation and is a reserved function. In addition, many of the projects that arise from the LAP and will require planning approval in accordance with the statutory procedures for any projects arising from the Strategy and LAP. Please refer to the Explanatory Note in Section 4 of this Report.</p>



There is considerable concern in the community that the proposed Gallops Avenue plan is being pursued despite its being rejected by Kildare County Council last year. People have made it clear they believe this weakens local democracy, per se, and individual and community faith in the power of the vote at local level. This, obviously, affects their sense of agency, which is something all of us want to avoid. I am very glad that we have this consultative process which is in keeping with the civic aspirations and expectations of communities in the 21st century. Planning and development cannot, and must not, be done 'over the heads' of communities, but rather through consultation and collaboration

Noted

2 Concerns that the proposed plan is already outdated, being outpaced by development of the built environment and new public attitudes to health and sustainability

Noted, please refer to the Explanatory Note in Section 5.0 in relation to the Gallops Avenue proposal.

The route is based on a 26/27 year-old plan, perhaps suitable for Naas in that time, but definitively and logically, not an adequate transport proposal for the modern, major and growing commuter town that is Naas now. It would be impractical and illogical for a plan, prepared for a wholly-different era to the current busy reality of housing, business, traffic, commuting, and in addition, the increasing public and community awareness of climate, noise & air pollution and air-quality, to be progressed without the consultation we are having. Air pollution and quality are of particular concern for families with children, as they are for the elderly and those living with respiratory conditions

3 Concerns that the route plan is 'blind' and therefore unsustainable

Noted, please refer to the Explanatory Note in Section 5.0 in relation to the Gallops Avenue proposal.

In a sense, the Gallops route was planned 'blind' to the current state of development in Naas, leaving aside that expected in the future. A future, perhaps, with even higher population, more business and commuting, increased traffic. In addition, the predicted 6-to-10 year term of its delivery raises further questions about its sustainability and capacity in the longer term. Constituents cite, for example, a situation of congestion on the Blessington Road alone, should further planning be granted. They are concerned by what they regard as a constrained, and constraining, route plan. They prefer an outer ring-road option, to provide the capacity, quality and the breathing space (literal and metaphorical) essential for their lives and those of their children and grandchildren

4 Concerns that the route splits the lands of the racecourse; isolates the amenity

Noted, please refer to the Explanatory Note in Section 5.0 in relation to the Gallops Avenue proposal.

All of us take great pride in Naas Racecourse's reputation nationally and internationally. The route's splitting of the racecourse lands would do little to enhance this amenity and also have a potentially-deleterious impact on the everyday lives of those in the estates affected, namely The Gallops and Racecourse Gate. This, to the degree some residents say they would feel 'imprisoned' in their homes. Moreover, as we are all aware, the Gallops Avenue aspect has been rejected by residents as a replication of the plan already defeated

5 Concerns that the plan's age renders it obsolete and therefore not the best use of public funds

Noted, please refer to the Explanatory Note in Section 5.0 in relation to the Gallops Avenue proposal.

Covid19 leaves Ireland in uncharted economic waters. Value for money, with the right projects, being funded at the right time, will be absolutely essential to, and in, our economic future. With the public need and demand for an outer ring-road at an all-time high, it is necessary to look again at the plan in terms of financial and economic sense. Could that money be better and more strategically invested in the ring-road per se and on other community initiatives to protect jobs, increase financial security and quality of life for the community?

6 Concerns that the plan could have a negative impact on health and safety of the affected communities and therefore cannot achieve its "holistic" objectives

Noted, please refer to the Explanatory Note in Section 5.0 in relation to the Gallops Avenue proposal.



I believe the health and safety of residents along the chosen route is, and must be, a primary concern. Families are worried that the volume of traffic on the route would impinge on safety of children and the sense of security of their parents, in terms of exiting these estates by walking or cycling. There is a real concern among residents for example at Kingscourt, The Gallops and Racecourse Gate, that the difficulty for pedestrians accessing shops and leisure services at Monread would be compounded by further. This is a valid and serious health & safety concern which applies equally to residents of Sundays Well, The Paddocks and Woodlands. Could such volume of traffic see the plan fail in its 'holistic' aspiration?

Specifically in relation to the so-called Gallops Avenue Plan:

Concerns that the plan would result in excessive vibration, noise and air pollution

Vibration, noise and air pollution could impact powerfully on the inhabitants of hundreds of homes along the route. People are voicing serious worry that this volume could lead to levels above and beyond those within the town or the along the Dublin Corridor. There are worries also that the chosen route is too close to, and therefore with the capacity to overwhelm, its 'neighbouring' communities. With more research being done into air pollution and paediatric, geriatric and general respiratory health, the nearness of the route to populated areas must be a logical consideration. In terms of noise and vibration pollution, the recent Covid quarantine showed the community in Kildare and all over Ireland, the value of peace and the improvement in quality of life by the removal of excess noise from their lives. This realisation will be a factor in all road transport development into the future, as communities' environmental perspectives and priorities progress and deepen.

Concerns that the plan is short-term in the 'relief' it offers

There is considerable concern that the plan is too short term with any 'relief' offered referring to a situation of almost 30 years ago, as opposed to today. When it comes to roads and transport, communities are no longer seeking short-term 'relief' per se but a long-term, sustainable 'renewal'. Such renewal to be achieved, in so small part in this case, through an outer ring-road, at a distance sufficiently removed from residential development and in keeping with the 21st century ambitions, needs and aspirations of the community.

Once again, I thank you for the opportunity to make this submission. I trust these inter-connected observations will be considered and look forward to a good and positive outcome for our community in Kildare. We do better, all of us, when we listen to each other and work together.

Noted, please refer to the Explanatory Note in Section 5.0 in relation to the Gallops Avenue proposal.

Noted, please refer to the Explanatory Note in Section 5.0 in relation to the Gallops Avenue proposal.



7.12 Cllr. Carmel Kelly & Deputy James Lawless TD Submission & Response

Cllr. Carmel Kelly & Deputy James Lawless TD Submission	KCC Response
<p>A Transport Strategy that fully integrates and connects Naas & Sallins is very welcome. Sallins provides the main public transport link between this area and Dublin, therefore it is appropriate that both are considered together. However, I am concerned that road safety issues in Sallins are not addressed. This Strategy is an important element of the plan for the wider Naas area, but it must not be seen as a replacement for the planned Health Check for Sallins. The opportunity must not be missed to look at what will be necessary for the village of Sallins to grow as an effective community and ensure its residents can navigate their way safely around the village. This plan concentrates on moving people in and out of Sallins. I fear Sallins is an addendum. To quote your own words on Page 11 Overview 1.1 “This multi modal strategy will provide a blueprint for transport investment within Naas/Sallins and its surrounds which will support the delivery of sustainable development and the regeneration of the town centre.” Sallins will require Gateways, traffic calming measures, measures to make the canal bridge safer for cycling and pedestrians. I am disappointed these were not included.</p> <p>I do welcome the inclusion of Section 8 Public Transport Measures 8.1.1 -6. My interventions and appeals for a service comparable with “my mums little red bus” which runs in Galway city are well known! Building houses on the outskirts of Naas with no regular public transport links to the town centre/schools and train station is not sustainable.</p> <p>The current PfG (Programme for Government) is committed to a “<i>fundamental change in the nature of transport in Ireland and will mandate each local authority to immediately carry out an assessment of their road network to see where space can be reallocated for pedestrians and cyclists</i>”. Kildare County Council are already ahead of the curve on this.</p> <p>I would urge KCC to immediately begin lobbying for the Third Platform to increase station capacity in Sallins (Rail Option 6), as again in the PfG it states “<i>.....continue to fund safety works and capital improvements to the rail network, expand the Irish Rail fleet and progress the electrification of rail services to decrease journey times and emissions.</i>”</p> <p>For this area of the County to progress, it is absolutely vital that electrification and quad track be a priority.</p> <p>In the PfG “<i>We will promote cycling and pedestrian safety and enable this through improved design, increased separation and better signage and marking.</i>” The majority of cycle lanes are along main roads, which are not at all suitable and downright dangerous. Trying to encourage people, families and children to cycle to work, school or play will never be successful unless the concept of shared space is taken out of the equation.</p> <p>Some of my observations/comments on draft are –</p> <ol style="list-style-type: none"> 1. Welcome first step. 2. Public consultation and engagement limited, due to Covid 19, so I believe that timelines should have been extended. 	<p>The final strategy contains public realm proposals including gateway treatments and village centre public realm improvements for Sallins.</p> <p>Noted and agreed.</p> <p>Noted. The strategy does seek to engage with the Authorities responsible for the delivery of public transport to improve rail linkages to Sallins (increased capacity and service)</p> <p>The Naas / Sallies Greenway would be developed as a segregated route. Along other routes the delivery of high quality segregated infrastructure will be pursued.</p> <p>The Naas/Sallins Transport Strategy is a non-statutory document. KCC gave an initial time period of 4 weeks to stakeholders to review and submit a response (from 22/05/2020 to 19/06/2020. This was extended by a further 5 days until the 24/06/2020, giving a total consultation period of 4 weeks 5 days for stakeholders (and 3 weeks 5 days for the public). Please also note that any submissions received after the end of the consultation period but before the analysis was completed were also taken into consideration. In total KCC received 797 submissions from the public and 33 from stakeholders.</p>



3. The re-introduction of the Inner Relief Road is unexpected and against previously taken democratic decisions.

4. There should have been engagement with the residents along the proposed "Gallops Ave" before this document was released.

5. RD5 HGV Restriction in Town Centre, needs to be extended to Sallins Town Centre, in this plan.

6. Under Walking Objectives "Improve permeability to enhance access to homes, job, schools and services." While I understand the objective, I do not believe that you can impose permeability on long established, settled estates of 20 years. I give my own personal example. We bought our house off plans, in a cul de sac with a walk/cycle way. That was our choice for our family, for all the reasons that permeability works, access to school and local village in our case. But others' choice was to buy at the top of the estate in a proper cul de sac. Retro fitting permeability is not an option, if not already in development plan.

7. PERM 1 (Table 13.2 – Medium Term Measures) Extend Pavement on Clane Road. It makes no sense at all to delay this objective, I cannot see why it is not a short term or immediate objective! As work is currently ongoing at the site to provide a bypass, it would seem to be a waste of resources/money to have to come back to this very spot in the medium term 3 – 5 years.

8. Sites being considered for a Potential Bus Interchange – Option 6 Corbans Lane; I do not believe this is feasible, as Corbans Lane is home to two of the biggest schools in the town.

9. Option 7 for Potential Bus Interchange – The Harbour; I do not believe this is viable either. This area has great potential to be a hub for greenway/blueway.

10. To quote "encourage bus usage and reliability" does not mention accessibility for people with disabilities. Improved connectivity and transport links are all but impractical, if a person with a disability cannot actually access the mode of transport.

11. Requirement to look at how pedestrians/cyclists cross Wolfe Tone Street at the Sallins road end. Extremely busy junction, wide road making it difficult for people to cross. If you are a resident of The Sycamores and wish to walk or cycle into Naas Town Centre there is no way to cross the road safely.

Thank you for the opportunity to make these observations.

The strategy document clearly sets out the congestion relieving benefit that the Gallops Avenue would have on the Dublin Road. Delivering such congestion relieve would facilitate the provision of improved Public Transport and cycling and walking infrastructure along the Dublin Road. This would have a major benefit for estates such as Ashgrove, Greenway, Kingsfurze, Roseville and the Gallops. Any development of the Gallops Avenue would include the provision of high quality cycling and walking infrastructure.

Noted.

This can be examined in the future.

Providing improved permeability can be seen as an opportunity for established estates. With high quality design and appropriate lighting such measures will not have the negative anti-social impacts feared.

Noted.

This was not brought forward in the strategy.

Please refer to the Explanatory Note in Section 4.

Noted and agreed. However, this a matter to be addressed as part of an accessibility study rather than a transport study.

Noted and agreed.



7.13 Cllr. Anne Breen and Larry Breen Submission & Response

Cllr. Anne Breen and Larry Breen Submission	Response
<p>I am writing to express my total objection to the proposed road ref: Gallops Avenue.</p> <p>As a public representative I am dismayed, disappointed and extremely annoyed at the Council's decision to resurrect a similar road proposal to the previous inner relief road.</p> <p>This road was rejected emphatically by the vast majority of local representatives in the recent past under a Part 8 procedure.</p> <p>To reintroduce this proposal is a dismissal of local democracy and an affront to the local representatives involved, not to mention the electorate whose wishes were to reject the road.</p> <p>To reintroduce this road proposal under the guise of another name is both disingenuous and disrespectful to the public representatives who worked so hard on behalf of their constituents wishes to reject it in the first instance.</p> <p>My reasons for objecting to this proposal are the same as my previous objections to the inner relief road.</p> <ul style="list-style-type: none"> • Naas needs an "Outer Relief Road" • This road will not serve its intended purpose and will not solve any Naas traffic problems "short or long term". • This road is bringing traffic into the town to take it back out again. • This road will only shift the traffic problems and congestion to junctions at the Blessington Road, the Tipper Road and the Dublin Road. • This road will cause problems for anyone living in estates along the route, air pollution, noise pollution, road safety issues and accessibility. <p>In conclusion, this road proposal is out of date, not fit for purpose, wasting taxpayers' money, and has been already rejected on behalf of the people of Naas by their elected local representatives.</p> <p>I am requesting categorically that this proposal be removed from the draft plan.</p>	<p>Your objection is noted. The Strategy seeks to identify the list of measures which will assist in the management of transport throughout the town of Naas based on evidence based analysis. The strategy contains a range of measures relation to the entire town. The members objection to three of the near 80 measures is clearly signalled and noted.</p> <p>The town may well require an Outer Relief Road at some time in the future. However, the National and Regional planning framework, within which the Local Area Plan must be framed does not support the planning of this type of infrastructure. The current thinking is to develop dense central cores to the towns which intensify the core's population and supporting economy. The idea being that this will support the drive toward increased use of public transport. An Outer Relief Road objective would not be in line with this strategy.</p> <p>See above</p>



We wish to make the following submission and object to the road proposal for Millbridge Street,

A vehicular road and bridge over the canal will be very obtrusive and unacceptable at this unique and picturesque part of the canal corridor,

This area is a very important amenity for the people of Naas to enjoy for walking, recreation and enjoying the benefits of the outdoors.

This is only possible because of the peace, tranquillity, absence of noise, the natural beauty and the presence of a diversity of wild life along the canal,

The presence of a road and bridge over the canal would destroy this very special environment for the people of Naas and visitors alike,

The road would bring a significant increase in traffic through the area and on to the already narrow and busy Sallins Road causing unwanted congestion,

The increased traffic will also create potential road safety issues for the local residents in the neighbouring estates,

This proposal is inappropriate for the area, will adversely affect a very special natural environment and create traffic issues for road users and local residents,

We request that this proposal be removed from the draft plan

Ref. 10 - Permeability Measures

We would make the following submission on Permeability Measures,

Permeability is a good idea in principle but it does present potential issues as well,

Pathways between estates can be a potential source of anti-social behaviour and can also provide opportunities for undesirables to access in and out of estates for criminal activities.

Therefore planning should review the proposed routes very carefully to ensure that they are workable and acceptable to the people in the relevant areas.

Example: The proposal to put a path through the playground in Kingsfurze Avenue and also a pathway between Kingsfurze Ave and Woodlands, thereby adversely affecting Woodlands green area, suggests a lack of proper planning/consultation.

Planning should therefore have further consultation with the people in the localities for their views on what they feel will work best for everyone.

The Millbridge Street crossing, if included in the LAP as an objective, will be subject to the normal design process. This will include a complete project appraisal which includes a Multi-Criteria Analysis (MCA) and environmental analysis which would analyse the effects on the environment. The concerns of the Member are noted and it would be important to examine the matter raised in the analysis of the environmental effects of the proposal. It should be noted that the overall national and regional policy framework considers the intensification of the town centre to be a core requirement. This would suggest that there will be an intensification of development in the town centre which might include the Harbour Area and approaches.

The point is accepted. It will be very important to adopt a consultative approach to the provision of permeability throughout the town. The projects will have to include a high quality of design and deliver a sense of accessibility without loss of personal security to those living in the area.



Ref. Interchange - Option 7 - Naas Harbour Bus Station

This is an objection to the proposal for a Bus Hub at the Harbour,

The idea of a bus hub at this area is inappropriate, impractical and unacceptable,

The Canal Harbour area is an intrinsic part of the natural and built heritage of Naas and as such has been untouched by any unacceptable planning development in the past,

The Canal Corridor's attractiveness and appeal has been the absence of any obtrusive structures like bridges/roads in this central area along the canal.

This proposal would seriously detract from and damage the visual and environmental aspects of the canal waterways landscape and destroy the natural character of the harbour

We object strongly to this proposal and request that it be removed from the draft as it is detrimental to the natural and built heritage of the canal harbour area.

The Harbour Area is a significant resources to the town of Naas. The realisation of this resource will require development in the area which, it is hoped, will enhance the amenity and economic development of the area. In the event that the sighting of a Bus Hub is an objective of the LAP then that project will be the subject to the normal design process. This will include a complete project appraisal which includes a Multi-Criteria Analysis (MCA) and environmental analysis which would analyse the effects on the environment. The concerns of the Member are noted, and it would be important to examine the matter raised in the analysis of the environmental effects of the proposal. It should be noted that the overall national and regional policy framework considers the intensification of the town centre to be a core requirement. This would suggest that there will be an intensification of development in the town centre which might include the Harbour Area and approaches.



7.14 Cllr. Bill Clear Submission & Response

Cllr. Bill Clear Submission	KCC Response
<p>Some of the permeability options are doable but some need to be looked at. Some are good.</p> <ul style="list-style-type: none"> • The transport strategy should be renamed the movement strategy. As a document it should be how people move around the area and not just about transport. I suggest the name be changed. • Some of the pictures are inappropriate. A cycle race has nothing to do with the movement of people. We can supply more appropriate picture. • What is the brief as this is not clear. What was the brief given to the consultants. Was it just to create a document for the regulator or is there real appetite to change how people move around our town. • Considering the existing urgent context in terms of climate change, external positive pressures in terms of National Policy and strong supportive policy for change from both the EU and the UN and the reality of a car-dominated town of Naas, where there is a very low modal split in terms of reliance on vehicular means, why is there so little ambition expressed in this strategy to rebalance modal split towards walking/cycling and public transport. <p>There is no mention of emission or air quality. There is no information provided on emissions. Poor air quality resulting from transport is a major issue for healthy cities. Healthy Ireland and Slaintecare stress prevention and also link modal split choice to obesity.</p> <ul style="list-style-type: none"> • The proposal for Sallins needs to be vastly improved. The focal points are the Gaa club, The Train Station, the School and the supermarket. The town has a population of 6 thousand people and is missing footpaths on its main street. It has huge issues with its access to the school. This town has been let down badly by the council and its time we stopped just adding them onto Naas. We will provide more detail in our submissions as local representatives. 	<p>The idea of a transport strategy is similar to a movement strategy, but the latter is more insular in its perspective. The unavoidable fact in Naas is the imbalance between the employment growth in the town and the population growth which will outstrip the former. Therefore, public transport connectivity to and from points beyond will be a major feature of the movement of people for some time to come. Therefore, it would appear that a Transport Strategy is more appropriate to the title.</p> <p>Noted</p> <p>The comment is noted. It is agreed that the success of any strategy is dependent on its being implemented. However, the strategy cannot be implemented directly as it will require the authority of the LAP before projects can be selected and completed. The implementation of projects will depend primarily on political leadership to convince the public of the need for the change. It will also depend on resources in terms of funding and manpower. Local funding will need to be identified for the seeding and initiation of projects.</p> <p>The comment is not accepted. The strategy places walking and cycling at the forefront of the change. Nearly 50% of journeys begin and end in the town. The opportunity to shift these to pedestrian and cycle transport is very clearly identified and examined in the strategy. Proposals for the necessary changes to achieve that modal shift are put forward. Some of these are less palatable and will require drive for their implementation. However, the location of development (including schools and shopping) away from the town centre is a significant problem in regard to pedestrian and cycle movement.</p> <p>The comment is not accepted. The Climate Change agenda is being addressed by other teams in Kildare and there will be an obvious need to align the development of transport with the climate change strategy. However, to avoid confusion and maintain a logic to the structure of the council's activities, the two will be aligned within the LAP.</p> <p>This statement is not accepted. The strategy contains extensive cycling and permeability proposals for Sallins. In addition, it proposes a dedicated public transport bridge to link into the train station and significantly improved local bus services between Sallins and Naas. The final strategy will also contain draft public realm improvements for Sallins.</p>



- Did the consultants not look at exemplars in other European countries. The development of good urban walking and cycling networks is common-place right across Europe. The strategy makes no reference to such exemplars. Naas deserves to have access to good practice abroad. It is reasonable to expect that Naas should have a first class cycling network put in place over the next decade. The strategy fails to rise to the challenge.

- The inclusion of the Gallops avenue is strange but not surprising. This area should be developed as a Greenway and would have a more dramatic effect on movement of people in our town in a more sustainable way. The insertion of an outer ring road is more appropriate and just because the money is there we should not build something that is dangerous to cyclist especially ones going to school. I propose you remove the road and change it to Gallops Avenue Greenway. This will under the proposed program for government receive funding.

- Covid 19 is mentioned, yet there is a total failure to consider the impact that Covid 19 is having on the design of public space in cities. Auckland in New Zealand for example is implementing radical measures to pilot cycling and walking interventions.

- The current Programme for Government includes significant supportive policy for cycling and walking infrastructure which will be underpinned by very significant budget allocation. We need to be shovel ready for all these projects and we need to be visionary to ensure that what we design is of high quality. This document has some good points but they seem to be drowned out by old engineering ideas.

- Assuming the objective of the strategy is in part to build a cycling and walking network for Naas, why is Kerdiffstown Park omitted. A budget in excess of 30 million euro is being expended on this site. Likewise the recreational hubs at Killashee, Naas Rugby Club, Naas Golf Club and Palmerstown Estate are not acknowledged as major town destinations. Punchestown is not mentioned, and yet is intimately tied up with Naas in the public imagination, and can be reached by Craddockstown Lane, a route designed in walking and cycling heaven. In Dublin it would be considered normal to cycle 3 or 4 miles to enjoy an amenity, yet in Naas, an arbitrary boundary places the hubs mentioned above outside the scope of consideration. Can we not include a Naas Hinterland Zone, which could form part of the extended network of the town proper. This could support traffic-calming of the Grand Canal route to Digby Bridge for example.

- Defining an Integrated Cycling and Walking Network. The strategy is not convincing in terms of how the long-term diagram [10 year] on cycling and walking is arrived at. Does this diagram really represent a sustainable and optimal network, especially in view of the urgent need to rebalance modal split. There is no attempt to indicate how the short-term, medium-term, and long-term programmes will alter modal split in Naas, or when a critical mass of the network will begin to alter behaviour. Neither is there any attempt to map the critical gaps in the emerging network.

- The Multi Criteria Analysis includes 6 criteria, but fails to consider how movement infrastructure, emphasizing walking and cycling, and combined with a strategic public realm strategy, can build legibility and inter-connection in the urban structure. [both existing and future urban structure]

The point is not accepted. Kildare Co. Co. has a history of adopting best practice in completing engineering design. I refer the writer to the Explanatory Note in Section 4 of this report. The Strategy will inform the LAP which in turn will lead to a development of individual projects. The Council will adopt best practice and comply with national standards when developing projects.

The point is noted. The development of the Gallops avenue has been rejected previously by the Council. While that development included cycle and pedestrian facilities, the primary purpose of the Gallops avenue was to remove traffic from the Dublin Road and Blessington Road so as to allow that Dublin Road to be modified to allow for increased use by cyclists and pedestrians. The Dublin Road would be a more direct route for pedestrians and cyclists and accord with Desire Lines. As to the matter of an outer ring, this is unlikely to be advanced in the short to medium term as it is seen as contrary to the policy of moving to public transport and the climate change agenda. Refer to note on Gallops Avenue in Section 5.

It is expected that the response to Covid 19 (in terms of traffic movement) will be done over a short period. This strategy has a longer perspective and does not negatively impact on any response to Covid 19.

The point in relation to funding is noted. The programming of projects will be addressed when the LAP is complete as the objectives of the LAP form the basis of future projects in Naas. The point last point is not accepted.

The thrust of the project is to examine and encourage a modal shift in relation to the major traffic generators (journeys to work, education, shopping and business). While amenity journeys are addressed as part of the above, journeys to one specific amenity site located some distance from Naas and Sallins are not addressed in detail.

Refer to Figures 10.11 and 10.12 of the strategy report. I also refer to Table 10.6 of the transport strategy and the Explanatory Note in Section 4 of this submissions report.

This point is not accepted, the study is coordinated in approach, contains considerable analysis aimed at delivering mode share improvement for cycling and pedestrians. The gaps identified in the document needed to be filled in order to provide a foundation on which further work can be founded.



• Transport Strategy and Development over the next decade: The strategy states that the objective is to support land-use policy. The approach fails to consider any scenarios aimed at exploring the likely direction of development over the next decade. One of the core challenges facing Naas is to connect the perimeter development with the core of the town. There is a consensus that this will be largely achieved through the development of the North-West Quadrant. Apart from one major road and a single stretch of Greenway, the strategy is silent on the topic. This seems to indicate a very conservative stance, and a mind-set which seems happy to tinker with the status-quo.

• Schools: There is little effort to connect the schools to housing estates. The only reference to schools is to put in another drop off point at the lakes. This is not appropriate as we need to reduce car drop offs not encourage it. Safe route to schools need to be developed for each school. This has been done under the Naas Neighbourhood greenway document and will be more detailed in its feasibility study currently been drafted by consultants. A detail of a pedestrian and cycling only entrance for each school should have been looked at. St Marys, mercy Convent Primary school, Naas CBS, St Corbans Boys National school, Pipers hill, Gaelcoliste, all should all have indicative pedestrian entrances to them on this document.

• Town-Centre parking. There was much discussion in the preparation of the recent draft LAP regarding the need for sustainable mixed-use development of the large tracts of brown-field sites sitting either side of the spine of Main St, and currently occupied by surface car-parks. As a land-use, surface car-parks represent a very unsustainable use of a key resource, and undermines the viability of the town centre. It is curious that the strategy does not address this in any way. An overall framework is required to plan for a series of integrated regeneration projects, which can also reconfigure car-parking as appropriate.

• Bus-Interchange proposals. The proposal to favour a preferred option for a bus-interchange at Market Sq seems ill-considered. This location is the foremost public space in Naas. Currently even one or two buses in this location makes a major impact ,and yet the proposal plans for 6 bays. The impact environmentally would be very negative, and would also have a very considerable impact on the streetscape. The proposal does not seem to have assessed the location from an urban design impact, or considered opportunities foregone, to create a high-quality new public space for the centre of Naas.

• Detailed Problem Items in Strategy [Cycling and Walking focus]

• De-Burgh Lands; The cycling and walking proposals, neither short, medium, or long-term[S,M,L] connect into the de-Burgh Gardens, which are a public resource achieved through planning gain.

The strategy considers that the national and regional policy of development of the central core of the town will be the primary focus of the LAP. Peripheral development will then radiate out from the core. The primary access to that development will be by walking and cycling with public transport providing the primary link to other points beyond the town. Clearly this will take time to achieve and the infill between the town and the peripheral developments will take time. In relation to the criticism of land use policy, please refer to Appendix B.2 of the report.

The Naas/Sallins Transport Strategy does try to respond to the poor siting of schools at the edge of the town. It also tries to connect the schools to the housing estates. The Feasibility study mentioned would be welcome. However, the Naas Transport Strategy is not meant to detail individual projects. It is agreed that it would be preferable to have no drop-offs at schools and the proposals for a drop-off area can be abandoned if the Feasibility study mentioned can deliver a method for their prevention.

It is expected that this issue raised will form part of the planning considerations for the LAP. The team considered it does not require specific reference in the strategy as it is fairly obvious and a land use issue primarily. The strategy does identify some locations for alternate carparking. Those proposals relating to car parking will be examined when the Planning Directorate proposals for these sites is available. However, it is assumed that a reduction of car parking in the town will be necessary to discourage car journeys.

The presence of a number of bus stops (four to six) will have an effect and reduce the potential of the public space. This is seen as a medium term solution. As the town develops, a dedicated area for a bus hub will be needed and the strategy does deal with this. However, the hub must be near the town centre with easy access to the centre and easy access for the road network including the M7. The hub would connect the town bus services with the Dublin commuter bus routes. The importance of the Market Square as a public space is accepted.

This area will connect to the Naas Sallins Greenway.



- The NTA are supposed to be looking after the radials, yet the Sallins radial from Applegreen northwards to Oldtown does not feature.
- The Newbridge road from Jigginstown to Bundle of Sticks is only included under long-term [a critical stretch linking Millennium orbital cycling back into Naas]
- Corbally Canal at Jigginstown, no proposal to reinstate canal through the building of new bridge.
- Corbally Branch: shown as part of Greenway, but no cycling [S,M,L]
- Craddockstown Lane: No cycling shown down eastwards beside school
- Blessington Road, No cycling from Ballycane Road junction, to Craddockstown Golf Club. Also Blessington Road to Ballycane Junction is long-term
- Rathasker Land. No cycling under S,M,L proposals
- Side of Aras Cill Dara to Osprey Hotel...no cycling proposals S,M,L
- Sarto Park, logical cycling connection from lights at Merrins Supermarket round to Harbour: No cycling proposal.
- Peripheral Employment clusters: No effort to expand cycling network to serve the employment clusters around the spine of the motorway
- Fishery Lane: no cycling proposals
- Arbitrary inclusion of 'existing cycling infrastructure'...for example it includes shared surface in Woodlands, and Ashgrove. Why are these included, and dozens of others are omitted. [There may be a logic here in building a strategic network, but no criteria is provided in support]

It is expected that permeability through housing to the east and west toward the bus routes to the east and Naas Sallins GDA cycle track (NTA scheme) to the west will provide the primary radial cycle routes for the area as these are located away from the busy Sallins Road. It is agreed that the radial routes do need to be addressed. It should be noted that the DeBurgh wall and the general road layout would render a project to provide cycle facilities along the Sallins Road very expensive and intrusive on houses fronting the road.

Please refer to 15 and 22 on Table 10.6.

Corbally Canal to Jigginstown does pose an opportunity for an amenity greenway but would not form a transport route.

Corbally Canal to Jigginstown does pose an opportunity for an amenity greenway but would not form a transport route.

Please refer to item 8 Table 10.6.

The current development under way along the route will provide sufficient facilities for those developments. See also item 7 Table 10.6.

This quiet lane does not require a separate cycle track

Provided.

Please refer to item 21 Table 10.6.

Existing Ring road has cycle facilities

It will not be feasible to provide cycling facilities along Fishery Lane

The type of streets which are typically suitable to be designated as 'Mixed/Shared Streets' for cycling and the criteria such streets should meet are discussed in Section 10.2.1 of the strategy. The existing 'shared streets' shown on the map were highlighted as they were considered to have some strategic function providing access into or through an area and/or linking other existing or proposed cycle infrastructure. Other streets which provide more limited access with a confined residential area were not shown as 'existing' as it was thought this would make the map unwieldy.

Most of the 'existing' shared streets shown also provide context for some of the proposed measures in the strategy. For example, a number have proposed 'minor cycling permeability improvements' located along them.



- Oldtown Estate: very little local cycling penetration.

- Grand-Canal Greenway –Naas Spur only included in Medium-term proposals.

- General Comments on Maps: The colour codes and keys on the maps are often confusing, and difficult to decipher at certain scales. Also the great number of maps used creates a weariness in the reader and also confusion. This is particularly so in the over-lap between permeability, cycling and walking. For example, the sections dealing with 'walking catchments' refers all the time to 'walking' in the text, but the accompanying maps includes the term walking/cycling in the key. One has to be forensic to ascertain if a proposed route includes cycling.

The cycling and Walking infrastructure must be a network. The focal points are the schools, clubs and estates. We need a joined up network that safe for children to go to school. This strategy is showing projects been done 10 years from now. This is too long. the document should have short and medium term only as it will be well out of date in 10 years. the Greenway and Nta funded cycle projects should be stitched into the document and not as an add on. The Inner relief road should be a greenway for walking and cycling only. This is the only way to change behaviour and get a modal shift towards cycling.

Similarly, at Woodlands, the addition of the proposed minor greenway link (25) in between the two sections of existing residential road which have been categorised as 'existing shared street' would provide a more direct quiet route from the southern part of the Woodlands estate and other destinations on Tipper Road (e.g. Hill House Pre School or the Racecourse) to Dublin Road, allowing people cycling to avoid some busier sections of road and/or busier junctions on the alternative route via Tipper Road and Blessington Road.

Please refer to items 24, 28 and 27 on Table 10.6.

Noted.

This is a high level movement strategy and certain objectives are common to both cycling and walking. The actual mode used will be confirmed through detailed design.

The period for provision of the infrastructure may be longer than would be preferred by some. While the availability of funding seems to have been resolved, there are other constraints on any programme for delivery. The engineering resources will have to be found to meet the new funding flow. The programme for Naas will have to be combined with similar programmes for other towns in Kildare. In addition, the LAP must be completed before the individual projects can be identified and prioritised. Each project will have to comply with the requirements of the Public Spending Code including the Common Appraisal Framework, the statutory planning and environmental requirements, Procurement requirements, and all these after the confirmation of NTA funding. The sequence of statutory and regulatory requirements will usually take a number of years for significant projects before the project is "shovel ready".



7.15 Cllr. Evie Sammon Submission & Response

Cllr. Evie Sammon Submission	KCC Response
<p>Positive to see a greater emphasis on public transport in the strategy and it will most likely match up with where Government funds will go down the line. There will need to be buy-in from residential areas on some of the routes and I think it will be interesting to see the response from groups in relation to this aspect. As this will eventually feed into the Naas Local Area Plan, I think we need to consider how bus routes through the town will benefit businesses in the town rather than our Main Street just being a bus corridor.</p> <p>I have concerns about the following permeability routes and believe that there may be paths that could be improved close by rather than these routes:</p> <p>Permeability Link 37 between Carraig Oscair housing estate and South Link Road, I believe improvements to Rathasker Road makes more sense than Link 37 through the estate.</p> <p>Permeability Link 53 is a proposed cycle route through Killahsee View, similar to link 37 there is a laneway that could be greatly improved to serve as the permeability link.</p> <p>Permeability Link 47 Kingsfurze – the estate is older and enjoy extensive privacy at the moment</p> <p>I think Covid-19 has proved that if people feel safe enough to cycle they will. I think the focus needs to be on links to the Town Centre in the first instance and then cycle routes in the Town Centre - really no point in having the Town Centre cycling-friendly if the main routes to it are not.</p> <p>I was disappointed to see the addition of the Inner Relief Road Route 2 – renamed ‘Gallops Avenue’ considering I was one of six Councillors to vote against the proposed route last year. Would be open to a discussion on it being a cycling/walking route but not a road.</p> <p>Parking is one of the most positive aspects and I welcome the introduction of signage letting visitor know of where parking is available in the Town. I think the amount of parking spaces is not an issue however the varying times in car parks and on-street parking is confusing.</p> <p>Overall, I welcome the draft Naas/Sallins Transport Strategy. It is positive to see a focus on public transport and cycling routes. While I have some reservations about certain routes which I've outlined look forward to the next stage in the process and to getting the strategy right for Naas.</p>	<p>Noted. In relation to Naas Town Centre businesses, increased and more efficient public transport will lead to a larger public transport mode share and a reduction of cars through the main street. This will ultimately lead to a more pleasant urban environment which will encourage more people to shop in the town. In addition, busses bring potential shoppers directly to the businesses in town. These are positive points.</p> <p>Noted. However, note that the purpose of new permeability links is to increase the catchment area of key areas (such as the town centre, schools, etc.) These new links will increase the number of people who can walk to these key destinations. Improving older links, while worthwhile in other ways, will not increase the catchment area. Also, please note that PERM 37 has been moved in the final Naas/Sallins Transport Strategy.</p> <p>Please note that PERM 53 has been removed in the final Naas/Sallins Transport Strategy.</p> <p>Please note that PERM 47 has been removed in the final Naas/Sallins Transport Strategy.</p> <p>Noted.</p> <p>Please refer to Explanatory Note in Section 4 of this report.</p> <p>Noted.</p>



7.16 Cllr. Seamie Moore Submission & Response

Cllr. Seamie Moore Submission	KCC Response
<p>Submission No. 1</p> <p>A chara, I have been instructed by the Residents Association of Ashfield Park, Naas, to make the following submission in relation to Permeability Strategy PERM 39 in respect of a proposal to construct a new Pedestrian/Cyclist Link between our Housing Estate and the Kilcullen Road.</p> <p>_*Submission; * _That no consideration be given to any such Pedestrian/Cyclist Link, across this 150 metres of undeveloped land, until a Planning Application for the use of the land is lodged. That the Residents of Ashfield Park be notified when any pre-planning meeting on the proposed use of this land be sought and that such a pre-planning meeting be informed of the concerns of the Residents of Ashfield Park about any such Link proposal.</p> <p>The Residents Association is not necessarily opposed to the Paths Link through any secure, well lighted, environmentally supported, internal roads/paths system of a neighbouring development but will not accept any future proposal to include motorised transport into/through Ashfield Park, on the basis of an earlier Paths Link acceptance. The Association also opposes an intern Path Link through such a large area of open ground passage that is without the passive monitoring of another resident group.</p> <p>On my own behalf and on behalf of Ashfield Parks Residents Association</p> <p>Submission No. 2</p> <p>A Chara, I wish to make the following submission on the Naas/Sallins Transport Strategy.</p> <p>_*Overview.*_</p> <p>This is a very welcome approach towards developing a holistic programme on planning Mobility & Movement in an old town with many new add-on developments, most of which have received planning approvals, solely for the footprint of that development and remain in isolation from other community life without Links to the town or elsewhere. The opening up of more pedestrian and cycling friendly Links is a welcome approach to promoting healthier lifestyles, for an 'Access all Areas' programme and for increased public movement without motor vehicles. Safe pedestrian and cycling Links to Public Parks, Amenity Areas, Sports Clubs and Schools should be prioritised. There should always be a need to consider 'Pocket Car Parks' to facilitate the disabled who wish to visit destination activity venues but need a parking facility near the destination point.</p> <p>_*Coronavirus Environment*_</p> <p>During the Coronavirus Pandemic shut down of Commercial and Social movement, as a confined 'cocooner' I much enjoyed the absence of the noise of motorised traffic, including plane over-flights and HGVs. This was an environmental pleasure that I have not enjoyed since motorised transport began to travel our roads and penetrate our ears with harsh noise after WW2. I have now found the return of such high volume and continuous noises as a constant, serious and a psychological intrusion on my hearing and on my mind. I am sure the vast majority of people experienced the pleasure of the 'lull in noise' of traffic and I will be supporting measures to limit both noise and air pollution. I am also convinced that the bird wild life was noticeably more active, more song-cheerful and more abundant in our built-up, tree-planted, residential area due to this reduction in traffic noise and air pollution. This Survey must take cognisance of National Plans to move towards more electrification of vehicles and to include medium term objectives on the restrictions of fossil-fuelled vehicles from the Town Centres and Residential Areas and to reduce noise intrusion.</p>	<p>The provision of permeability for walking and cycling will not be used as a precedence for additional vehicular access routes. The provision of these walking and cycling routes will require the support of the public and the design will have to be to a high quality. Security and environmental acceptability along with local support will be important when developing these initial projects. Clearly, many will be a by-produce of private development.</p> <p>The idea of "Pocket Car Parks" for disabled access is worthy of consideration. This is a matter for the location of disabled parking spaces which is a normal part of any detailed design.</p> <p>The point made is accepted. In fact, the thrust of the strategy is to move transport toward a more environmentally sustainable model. The measures in the Naas Transport Strategy support the climate change agenda. While the detail of Kildare Co. Co. plans to tackle climate change is the responsibility of other teams, there is no impediment to the support of electric vehicle use in the strategy.</p>



_ *Road Objectives; Transport Routes* _

_ *Town Centre * __ *Transport Routes

*
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_ *Note 1. * _ This Naas Transport Strategy has a unique distinction. It seems to have two 'birth mothers'. In the first instance it sets out proposed policies, objectives and strategies of walking and cycling 1) to get people to use healthier life styles, 2) abandon the use of personal cars and 3) free up the Town Centre/Survey Area for Bus Parking and Bus Travel. This is done with emphasis on the promotion and use of various forms of Public Transport, Park & Ride facilities and Restricted Parking. There is an assumption that all Bus Passengers live in/around the Main Street. The recent rejection, at an early stage, of the unfinished Naas LAP, was to a great extent based on its failure to identify how people (Shoppers and Bus Passengers) would travel from Suburbia Naas (average 3-4 kilometres) without the use of Car Transport.

This and freeing-up Main St Naas for better Shopping Facilities should have been the focus of this Transport Strategy. Few Bus Passengers originate as residents from the Town Centre. They presently and in the future, will originate from Circuitry Residential Areas outside of Town Centre. In other words, the vast majority will require a transport system to get to the proposed Bus Station (Hub). This will require sufficient and increasing facilities for parking near a Bus Station (Hub) or for Park& Ride further out from the Town Centre

In my opinion, many of the Bus Passengers exiting from Naas, are Workers/Students, going to Dublin/ Dublin Airport and elsewhere. In my opinion, many of the incoming Bus Passengers to Naas, are also Workers/Students/Airport Travel. It is also my opinion that most of the Bus Passengers on Transient Bus Services into Town Centre Naas, are _ *NOT* _ daily/weekly Shoppers/Visitors to the Town. Special Circuitry Buses bring and return shoppers, schoolchildren and hospital visitors. Many of these are existing 'Circuitry Bus Service' systems.

a) The Strategy (unless I missed it) does not support the creation/retention of any Centre Town Bus Hub with figures relating to where the passengers originate in Naas or Naas Hinterland.

b) The Strategy (unless I missed it) does not support the creation/retention of any Town Centre Bus Hub with figures relating to the purpose of passengers arriving/leaving Naas.

c) The Strategy (unless I missed it) does not support the creation/retention of any Town Centre Bus Hub with figures relating to 'further destination' passengers on buses arriving/leaving Naas.

d) There is none/little mention of an Objective of the Transport Strategy that an Improved Bus System/Increased Services into Naas will improve Retail Shopping/Other Business in Town Centre, Naas

The overall point is not accepted. This strategy includes a local bus service which will provide local access to the town centre and hopefully reduce the number of car journeys between the town centre and the residential areas. The local service will also interchange with the national bus service at the Hub. We have also identified the possible objective of a Park and Ride off the M7 that connects with the Sallins train service.

There is a proposal for a town centre based bus hub. The capacity and frequency of that service will be the subject of a specific project if the proposal in the strategy is included in the LAP. The local bus service will provide local access to the town centre and hopefully reduce the number of car journeys between the town centre and the residential areas. The local service will also interchange with the national bus service at the Hub. We have also identified the possible objective of a Park and Ride off the M7 that connects with the Sallins train service.

The development of retail shopping is an integral part of the economic objectives for Naas. It is expected that the transformation away from vehicular journeys between the town centre and the residential areas of Naas can be achieved without any loss to the economic life of the town and will stimulate further development.



e) The Strategy considered *Six Site* options for Bus Station (Hub) sites *OUTSIDE OF THE TOWN CENTRE* . Four of those were on the periphery of Corban's Lane/Friary Road 1) KCC/ Boyle's Car Park 2) Old Cottage Site near CBS, 3) The Unfinished Shopping Centre and 4) The Fair Green. By far, the biggest available site in this area was not considered!!!! It is owned by Kildare CC and known as 'Hederman's Car Park' also, on Friary Road. Another KCC Service (Depot) operates from the same site. It could and probably will be transferred to a centralised location. The site will also be expanded when the Railway Bridge is removed for other Transport Conditions re New Shopping Centre.

This would provide a second Site Exit/Entry dimension. A third Site Exit/Entry could be considered by the purchase of any one of a number of houses on Blessington Road. This *Bridgehead Link * would offer entry/exit from two Key Town Circuit Routes, Blessington and Friary Roads and open up serious, close proximity, consideration of a 'Round the Town Bus Service' instead of through Main Street Naas.

*This Strategic Site is 150 metres from Poplar Square via Friary Road and no more than 300 metres from Market Square via Church Lane. It could also be serviced by any number of Town Circuitry Bus Services. * * *

*I submit that this is a major omission by the Survey and gives rise to questions on the over-emphasis and selection of Naas Town Centre as the location for a Bus Station (Hub) and requires an explanation. *

*I submit that the Hederman's/KCC Car Park should be the Centralised Bus Station for Naas Town. The Bus Hub removal from Main Street, with other modifications, would greatly enhance the Shopping Experience.

*

*General Traffic in Main Street Naas. * With the removal of all but selected and limited Bus Services from Main Street Naas, consideration should transfer to a One Way Route System for general traffic. This would allow for further Pocket Parking Sites for Shopper's cars and *Shared Street Space, at new Restricted Town Speeds for cars and cyclists * . It would also provide new space for wider footpaths and new cycle paths which was previously not viable in narrow street sections of the Town. A South to North (left-side channel) 'One Way' Route System (with an option for motorists at Murtagh's Corner, if they preferred Corban's Lane to access the new Shopping Centre multi story Car Park) would best give the maximum parking facilities using the opposite East side of the Street, with the use of Basin Street and Kennedy's Lane as providing access to existing 'Off Street' Parking Facilities and Moat Lane a Re-Entry to Main Street.

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Other Transport Routes

*The Gallops' and Millbridge Roads (Rd 1 & Rd3) * In the second 'Birth' instance, The Survey re-introduces proposals for the construction of roads to facilitate the diversion of Cars and HGV Transport from the Town Centre into existing built up Residential Centres, on proposed routes that have long since been superseded or have recently failed to obtain community or public representative support. This is not a balanced strategy. It is quite unfair and pure disingenuous to give Town Centre a reduced Traffic & HGV traffic loading by transferring the same volume of traffic into heavily, built up, unprotected, Residential Areas. Policies should be agreed on a fairness and balanced basis.

The strategy considers all the sites selected are in convenient proximity to the town centre. However, should the proposal to develop a bus hub become an objective of the Local Area Plan, then there would be a need to develop a specific project to bring the development about. The project would require the designers to examine all options (including Hederman's car park) and select the most appropriate scheme. This is a requirement of the Public Spending Code.

The restriction of traffic to one direction on the Main Street would require an alternative route be available in the first instance. The development of Corban's lane and the restriction of parking on that street would allow this, then a proposal to limit traffic to one direction could be considered. This would allow the development of space for cycles and pedestrians. The proposal would however necessitate the removal of the bulk of on-street parking.

The strategy, in general, does not propose the diversion of heavy traffic into residential areas. The general point of objection to the Gallops avenue proposal is noted.



Proposed Diversion Routes for heavy volume and heavy vehicles, whose numbers, no doubt, will increase even more with time, should be planned outside of existing built-up Residential Areas. Retro-fitting proposals to divert heavy volume traffic and HGVs into Residential Areas in any market-purchased housing scheme in Naas is never likely to win the approval of that Community. As part of the wider similarly populated community it will also have the support and sympathies of other such Residential Groups. Perhaps, in the mid-term the possibility of more appealing cycle lanes and pedestrian paths through the same routes should be considered and thus allow for connectivity and permeability in a more acceptable transport form. I have no doubt that both Road Objectives (RD 1 & RD 3) will be rejected again and with it, will go, the possible rejection of the full Roads Transport Strategy in its present form. Moderation might be more acceptable for Link objectives in those two areas. The two Road Proposals (RD 1 & RD 3) proposal must be
a) tempered to a lower objective b) withdrawn or c) face another costly failure.

Note 1 'Gallops'. There was an original Route 6 recently considered by KCC & Members, under a Part 8, for the last section of the Eastern By Pass of Naas. It was the Kildare CC 'Second**Route* ** 'Gallops Option' from an original selection of 8 in number. It also had the support of all Communities in that Eastern Block of Naas. It does not seem to have been 'Volume Studied' by this Strategy as with Option 1. This is a pity as the comparison of Route 6 with Route 1 would be more realistic, under every consideration. The Strategy makes reference to a Route 1 (Alt) which was not previously considered as it would route through the actual Race Track of Naas Race Course Company. The elimination of the Racing facility and business would be out of the question! The Strategy also presents a reference to its own Option 6. Interestingly enough it proposes to use the Fishery Lane junction as the exit, as with the earlier KCC Option 6. This would be an Outer Ring Road consideration, not a reasonable or similar comparison, very futuristic and also outside of the limit of the longest term of this strategy. In essence the two considerations to Option 1 (1 Alt and 6) would always be 'Non-Runners'.
*So, no real Alternative is compared or offered. *

Note 2 'Millbridge'. The re-introduction of Millbridge Street as a new Road is difficult to understand. It has been superseded (since first presented and publicly rejected) over the past 20 years, by 1)The Millennium Park Inner Relief Road, 2)the Upgrading Improvements to the Monread Road to Inner Relief Road Standard and 3)the addition of Interchange 9A to the M7 giving three Interchanges and alternative route options on/to the west side of Naas and Sallins Rail Station. Future Housing developments and existing Residential Blocks on the West side of Naas are presently linked to both of those major road streams, Sallins Station and Dublin destinations by the Old Caragh Road and 4) a new, under construction, New Road, that will link with the futuristic 5)Spinal Kerry Group to Naas Harbour Route Road and Central Naas, will double the traffic movement options of that area at a future date.

Note 3. The upgrade to Murtagh's Corner, into Corban's Lane is to be welcomed but the objective term should be shortened to 'Short Term Project' (1-2 Yrs) and be completed inside of the Two Years.

Note 4. The Aldi Distribution Road Strategy proposal has been on LAP and other objectives for many years and would be welcomed as soon as possible.

Note 5. The Ban on HGVs in Town Centre Naas would be welcomed as some HG vehicle drivers use the centre town route throughout the 24 hours of day. The removal of HGVs will add to the environmental settings of Pedestrian Areas and the Shopping Experience in Naas.

Note 6. The upgrading of Signalised Junctions to MOVA & SCOOT systems is welcomed but should be completed within the Short Term (2 year) Plan.

Note 7. (Recommendation) An agreed preferred route using the Ring Road System for Ambulance Services to/from Naas General hospital from its Depot in Monread or other Hospitals should be agreed. A specific route would be helpful for Ambulances Drivers and would/could avoid the Town Centre.

The strategy, in general, does not propose the diversion of heavy traffic into residential areas. The general point of objection to the Gallops avenue proposal is noted.

The strategy, in general, does not propose the diversion of heavy traffic into residential areas. The general point of objection to the Gallops avenue proposal is noted.

Please refer to Section 6 of the report which provides a detailed analysis of the Millbridge Street objective.

The routing of ambulances is a matter for the ambulance services and HSE



Note 8. (*Recommendation*) Redundant from City Centre Usage, of Large Double Decker Buses should not be used in Town Centre Naas for very small numbers of school children and should be barred from tight lanes/back street routing.

Sallins Rail Station/North West Quadrant/Naas Canal Harbour Area

Note 1. This particular Strategy of a Destination & Link Route, is a 'Stand Alone' Objective. It is a long time mooted concept and if completed it will link West Naas into Town Centre without compromising other existing and future travel patterns in/around the town. The completion of a 'Transport Hub' at The Canal Harbour is almost 100% dependent on a suitable Park & Ride Facility at/near the Harbour to park vehicles that will not be allowed to travel across the Canal Harbour. It is unbelievable that the proposed concept of that Car Parking issue has not even reached a discussion level with the land owner of the only available Canal Harbour site, who is presently commercially in talks with another Government Agency for the sale of the same site. Otherwise this is a welcome strategy.

Cycling & Walking Strategy

Strategies for Cycling & Walking should in the first instance be addressed by promoting and developing the Historical Walking/Cycling Road Routes of *Craddockstown, Tipper East, Rathasker, Old Caragh and Canal Roads as Spinal & Primary Amenity Area Corridors. They should be supplemented by *other Heritage Related (Canal & Rail) suitable Greenway Corridors in Naas.* No future Housing developments should be allowed to feed Motorised Traffic on to any of those Corridors and only traffic from existing residents allowed. They should be exclusively used for walking/cycling and environmentally enjoyable amenity trips from the Town into Rural Naas, with Feeder Links distributing users on/off the Routes into/through Residential Areas. The identified Roads are already covered as amenity walk routes in a succession of Naas LAPS.

*Permeability Link Routes in Naas

Note 1. In general, these are welcome. Due to historical problems of local anti-social activities and the perceived insecurity/lack of safety of some former Link Routes in Naas, many such Links have been previously removed or deferred by Order of the Local Authority. Consequently, there will be a need for the Authority, Members and Consultants to consider appeasement discussions with Residential Groups and to offer infrastructural incentives i.e. walls, lighting, environmental servicing, perhaps even CCTV, to renew community confidences in proposing their re-opening.

Note 2. There will be a requirement to improve shadowy areas with improved Town Lighting, for after dark usage and the elimination of dumping/littering in Town Centre areas, where Side Streets and Lanes provide very useful connectivity during daylight hours.

Note 3. Permeability is to be welcomed as an essential form of Community Development and easier mobility and access movement throughout a fast developing ring of residential estates around the town. It will be important that a series of Resident Group meetings are arranged to gain support for the Retro-Fitting of new proposals. This will help to offset concerns of residents, who may have previously experienced bad anti-social activities or may have enjoyed a privileged isolation that has become very acceptable to them. It will be an invitation to social unrest if the Local Authority proceeds on the basis of issued public notices or a general approval of the overall project in which sensitive projects are included. Inter-action negotiations with directly affected resident groups will play a major part in the success of the Transport Strategy in sensitive areas. Elected members are prepared to assist in such necessary negotiations. It is also important that Alternative Plan B Routes are considered in long term strategies.

Permeability on Town Street Pavements

There is a proposal for a town based bus service. The capacity and frequency of that service will be the subject of a specific project if the proposal in the strategy is included in the LAP.

Noted. However, pedestrian and cycling routes need to follow desire lines as directly as possible in order to provide an attractive transport option.

The provision of these walking and cycling permeability routes will require the support of the public and the design will have to be to a high quality. Security and environmental acceptability along with local support will be important when developing these initial projects. Clearly, many will be a by-product of private development.

The co-operation and assistance of the elected members will be central to the success of the objectives of the LAP. Those objectives will be informed by the Naas Transport Strategy when the LAP is drafted.



Note 4. Greater detail is required on how SAFETY for vulnerable pedestrians will be managed on street footpaths. Promotional Sandwich Boards and temporary infrastructures like shrub boxes must be removed.

This must be done in conjunction with a previously agreed Local Authority Pavement & Street, Colour-Coded, Finger-Posting Signage Plan to holistically identify, Public Offices, Tea-Rooms, Restaurants, Antique Salesrooms, Hotels, Theatres, Community Buildings or Historic Places of Interest. Vulnerable pedestrians are invited to use Street Footpaths in_*safety*_ . However, Adult Cyclists, Scooter Users, Electric Mopeds, Skate boarders (many of that list simultaneously using Ear

Plugs) are constantly intruding on this passive pedestrian area. A comprehensive programme, rather than piecemeal adjustments, should cater for the many facets of Street Footpath usage, with_*safety and relaxation*_ as the highest requirements for pedestrians and shoppers.

The footpaths in the Streets of Naas Town Centre are presently very unsafe.

_*Greenways

The Greenways of Naas-Sallins Canal, Naas-Corbally Canal and old Naas-Baltinglass Rail Line (C3) to Pipers Hill Area, should be developed as quickly as possible. As with other successful towns, these will be seen as Flagship Projects and will signify the Community Gain of the objectives of the Transport Strategy. With a 10 year term as a scaled programme, the 'All-in-One' Package will not get approval as "One Part 8" project and will only succeed with reduced 'Part 8 Packages' that can be identified with Community Gain.

*Sallins Rail Station.* Proposals to construct a Bridge over the M7 to facilitate a small, insufficient Rail Station that has insufficient Park & Ride facilities near the Station, insufficient space to elongate for increased size or multiples of Rail Carriages and insufficient space for Station Capacity to expand in any sustainable-for-the Future, objective, would carry a health warning on a 'beautiful waste of money'. The option to consider any move westwards for a Second 'Sallins' Station to obtain space for increased site capacity, park & ride facilities and increased train services would be welcomed by prospective passengers from South Naas, Caragh, North West Quadrant and Sallins. Any move westwards for an additional Sallins Station would /could be serviced by M7/9A Interchange, Sallins By-Pass, Millennium Road, Caragh Road and the futuristic Naas-Kerry Group Road from Naas. This option to move/partly move the Sallins Rail Station westwards to a new Second Station site is a very positive and a sustainable consideration

These are matters which will be addressed as part of the LAP process rather than within this strategy.

No comment

This strategy does propose options for the future development of the railway and station at Sallins. The need for park and ride facilities is considered and the strategy proposes that Kildare Co. Co. press for the extension of the DART service to Sallins. It should be noted that the strategy envisages an increase in the use of rail services by the people of Naas but access to the Sallins Station is expected to be by public transport, cycling and walking.



*Transport Strategy; Car Parking. * Parking is one of the sub-sections identified in this Strategy. It covers Parking requirements for Rail Stations, Town Centres, Schools and Park & Ride. As a Strategy/Survey there is a high expectation that in conjunction with the elements of Health, Safety, Environment, Transport Routes, Hubs, Travel Times etc etc it would reveal improvements and additions to assist the element of Retail/Shopping with at least suitably positioned Town Centre Car Parking ideas. It must be emphasised that Public Consultations indicated that 88% of respondents considered 'Increased Car Parking' as 'Important or Higher' and 73% identified an increase in Real Time as 'Important or Higher'. These high level figures should not be ignored. The summary of this Strategy is that they have been ignored. The findings of Car Usage and Parking Requirements of this Strategy is in line with 2016 Census Data, that identified "67.7 % of people in Provincial Towns and 77.7% of people in Rural Areas" use cars to travel into towns for 'work, business, socialising and shopping'. Again, these findings are ignored!!! Naas is not a city, but a Commuter Town. It relies heavily on the use of cars and does not have the necessary volume of Local Employments or Public Transport Options to abandon cars in favour of walking or cycling or in favour of a minimal, public bus service working through The Greater Naas Area. Only 22% of Rural dwellers can do that. Only 2.5% of people cycle to work. These also are Census 2016 figures. It is logical therefore to expect that it will be 'Cars, Cars & Cars' for long more than the ten years of this Strategy and we must provide for their continuity, however limited. To promote the location of a futuristic Bus Transport Corridor via the Grand Canal Harbour, a new Car Park is proposed for a site close to The Harbour. This site is also offered as an alternative car parking site for the removal of car parking facilities for two locations in Poplar Square and Pay Parking on the Dublin and Friary Roads. If it should happen that the Local Authority secures that Harbour Site, it will also provide an alternative Parking facility for the removal of 60 car spaces on Kilcullen Road. It should be noted that it is a long distance (c 800-1000 metres) from Poplar Square, a totally unsuitable distance for destination shoppers/visitors to that area. In general, between proposals for new Cycle Lanes and this Transport Strategy, upwards of 120 Car Spaces will be removed, leaving very few Spaces in Town Centre Streets.

Retail & Shopping Rejuvenation in Naas and the Need for Centre Town Parking. I will accept that a new Multi-Story Car Park of c 800 spaces in the area of The Canal Harbour will greatly balance the needs for Town Parking in North, Centre and South locations of the town, each sector with private car parking to accommodate 700-800 cars. Without The Harbour Car Park, or during the interim, serious consideration must be given to a One-Way-General Traffic-System, the banning of HGVs and the routing of a large number of Transient Destination Buses via Corban's Lane and the offering of the freed-up channel Space on the East Side of the Main Street to provide new pockets of car-parking spaces. Such a One-Way System would greatly assist the provision of cycle lanes, wider pedestrian paths in tandem with a reduced traffic speed of no more than 20 kph and the use of extra widths as Shared Street Space. There is no identification of any consideration been given to new Park & Ride Sites around/on the main traffic routes into Naas, that would allow visiting or locals from peripheral residential areas, to abandon a car and travel without delay into a Retail Naas. An enlarged Bus Station (Hub) in the Town Centre will cause chaos, deprive Retail Naas of visiting shoppers from rural Naas and hinterland towns. I cannot see 2.5% of the population of Naas (cyclists) or local walkers having sufficient retail influence in rejuvenating power to improve the Naas Shopping Experience with this Strategic Transport Plan. Visitors/Shoppers to Naas will welcome the proposal to E-sign and highlight Vacant Car Spaces in the Town Centre. This proposal should be brought forward to the Short Term Period.

Summary. A lot of detailed information, radar highlighting and retro packaging but a lot of forward promotion of good ideas on signage, walking, amenity cycling and permeability links. The Strategy fails very badly in the short and medium time scales of supportive town transport measures for an improved Shopping Experience in Naas. Without the volume of people and City Life the proposals to remove parking in favour of improved Bus Services will not provide any traction to a Great Naas Shopping Experience. In fact, it will add to a Negative Shopping Experience. We may get environmental improvements and a takeover of the Town Centre as a Bus Station but that is the most that the Strategy will deliver. We would want more for the Town of Naas than a marvellous Bus Station in Town Centre, with most of the shops closed for want of shoppers and visitors, until the next Strategic Transport Survey re-directs a need for Pocket Parking and/or Park & Ride facilities.

The point is noted. However, National and Regional policy is to encourage a move away from private vehicle journeys. The strategy is required to follow national and regional policy when developing local policy.

The points raised have been considered in the strategy. National and Regional policy is to encourage a move away from private vehicle journeys. The strategy is required to follow national and regional policy when developing local policy. It should be noted that the Park and Ride proposals are for a Park and Ride facility near the M7 with access to Sallins Station.




7.17 Applegreen Services Area Ltd. Submission & Response

Applegreen Services Area Ltd. Submission	KCC Response
<p>David Mulcahy Planning Consultants Ltd have been instructed by our client, Applegreen Services Area Ltd, to make a submission concerning the above matter.</p> <p>Our client's own lands measuring approximately 6.37 hectares at the former Cemex site, Dublin Road, Naas, Co. Kildare. The lands are serviceable and 'ready to go' and in conjunction with the adjoining Donnelly Mirrors site form one of the key strategic opportunity sites for development in the town. Our clients are very eager to develop this gateway site at the earliest possible opportunity and have held recent positive meetings with the Planning Authority in this regard.</p> <p>We are very surprised that submit that there is a notable absence of any proposed public transport link to the subject site under the draft transport strategy. The absence of such links could prejudice the future development of the site, particularly if it is to develop as an enterprise/employment hub as per the zoning objective. We submit that is imperative for the future planning of Naas town that this site is tied back to the town centre via public transport.</p> <p>We highlight the submission from the Office of Planning Regulator to the Draft Naas LAP which highlighted the new employment generating land use zonings that were proposed in this north west quadrant of Naas and the potential impact this would have on the road network and consequently on sustainable travel patterns, energy demands and climate change. The implication by the OPR is that drawing car based trips to these lands from a wider area across Naas and effecting key strategic interchanges, has not been the subject of a transport strategy to inform the land use zonings proposed in the draft LAP. This needs to be addressed in the transport strategy as to omit this key site (and the adjoining Donnelly Mirrors site) wholly undermines the strategy.</p>	<p>Noted. However, is the view of TII and KCC transportation that high trip intensity land use at this location will have a negative impact on the capacity and operation of junction 9. A lower intensity land use may be more appropriate.</p> <p>This area is well served by existing bus routes. Please refer to Figure 2.11 in the Naas/Sallins Transport Strategy Report.</p> <p>See Appendix B.2.</p>



7.18 Crylock Developments Ltd. Submission & Response

Crylock Developments Ltd. Submission	KCC Response
<p>1.0 INTRODUCTION 1.1 On behalf of our client, Crylock Developments Ltd., Newhall, Naas, Co. Kildare, we wish to make a submission on the Draft Naas/Sallins Transport Strategy, in respect to the proposed transport planning framework as it relates to their lands at Ladytown, Naas.</p> <p>1.2 This submission is made in response to the non-statutory public consultation process being undertaken in respect of the draft Transport Strategy document, prepared by AECOM. A summary public consultation document has also been prepared and published, and the current submission has regard to the contents of that document.</p> <p>1.3 The structure of this submission seeks to identify some specific alterations and additions to the text of the Draft Transport Strategy document. These changes are set out at the outset of Section 3 below, along with a brief rationale for each change in planning terms. Appendix 1 to this submission sets out the locational characteristics and service provision which supports the delivery of datacentre development on our client's lands. The body of this concise submission is also supplemented by planning policy analysis, which supports the assertions made and the suggested amendments to the text of the Draft Transport Strategy.</p> <p>1.4 Our client's lands that are the focus of this submission are located approximately 2 kilometres to the west of Naas Town Centre and adjacent to the Newhall Junction of the M7 (see Figure 1.1 below) and contiguous to employment uses to the north east. Our client also owns the lands to the immediate west.</p> <p>1.5 As set out in further detail within Appendix 1, the subject lands are traversed by high voltage electricity transmission lines, gas infrastructure, and also benefit from access to high quality telecommunications infrastructure allowing for high speed connection and resilient connectivity. The lands also benefit from access to a high standard of wastewater infrastructure due to their proximity to the Osberstown wastewater treatment plant. A recently completed sewer line traverses the subject lands and provides a connection to this facility.</p> <p>.</p>  <p>Figure 1.1: Site Location with extent of client landholding outlined in red</p>	



2.0 DRAFT NAAS / SALLINS TRANSPORT STRATEGY

2.1 The Draft Naas / Sallins Transport Strategy has been prepared by the Planning Authority's appointed consultants, AECOM, and follows a first phase of non-statutory public consultation which was undertaken during March and April 2019.

2.2 The Draft Transport Strategy document sets out the relevant policy context informing the Strategy preparation, summarises previous consultation and stakeholder engagement, and outlines proposed measures under the headings of public transport, road transport, non-motorised measures, and public realm improvements. This section of the submission seeks to highlight elements of the Draft Strategy which are of relevance to our client's landholding at Ladytown.

2.3 The study area for the Draft Transport Strategy is outlined within Figure 1.2 of the document, an extract of which is provided below. As indicated on the extract provided below, our client's landholding straddles the boundary of the study area for the Draft Strategy. As will be set out in further detail within Section 3 of this submission, it is considered that the subject landholding should be included in its entirety within the study area given the inclusion and zoning of the subject lands in the now-withdrawn Draft Naas LAP 2019-2023, which identifies the lands as a suitable location for data centre development, thereby acknowledging the infrastructural assets of the lands and their suitability to accommodate a very low trip generating employment based use such as a data centre campus.

See Appendix B.2.

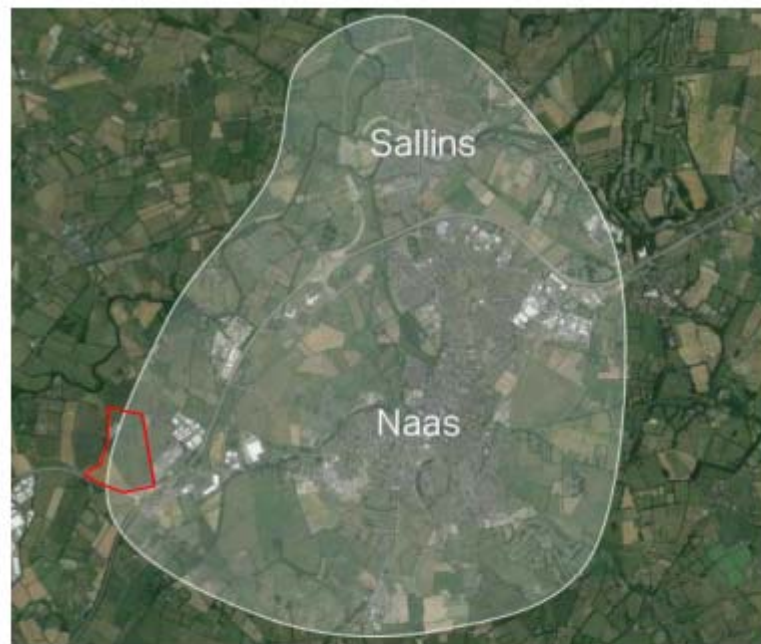


Figure 2.1: Extract of figure illustrating the study area for the Draft Transport Strategy, with our client's landholding outlined in red

2.4 Chapter 6 of the Draft Strategy sets out the analysis tools utilised in the formulation of the document. Section 6.2 details the use of a 'VISUM Model' to develop a future model of traffic based on TII guidance. Our client's landholding was considered in the undertaking of this modelling as indicated within Figure 6.2 of the Draft Strategy document.



Figure 2.2: Extract of figure 6.2 from the Draft Strategy, with our client's lands identified

2.5 Section 6.2 notes that the detailed background to the modelling undertaken can be reviewed within the Strategic Transport Modelling Report, however this has not been made available for comment at this juncture.

2.6 Section 9.3 of the Draft Strategy document provides further detail in relation to traffic modelling and the methodology utilised. This section clarifies that the traffic modelling undertaken to inform the proposals in the Strategy was based on projected uses, assuming a full build-out with a notional use mix and density / intensity of use based on the land uses within the withdrawn 2019-2023 LAP. While it states that some of the zonings under the withdrawn LAP might be subject to change in the forthcoming 2021-2027 LAP, this section also notes the following: *“Future changes to land-use zonings on the periphery of the town are unlikely to have significant impacts on the appropriateness of the assessment in selecting interventions which benefit Naas town centre.”*

2.7 Under the withdrawn 2019-2023 LAP, our client's lands had been zoned for Enterprise and Employment uses (objective Q), with a specific objective which was as follows: *“Q1(8) Newhall / Ladytown: The site has been identified for a potential new data centre, provided no other more suitable and sequentially preferable lands are available for a data centre in the plan area. Development, other than a data centre, will only be considered on a sequential basis and only when other identified Enterprise and Employment lands have been developed or received planning approval. The development of these lands will require improvement to the Ladytown junction on the Naas Newbridge Road and to the local road infrastructure (L2031 and L2006) linking to the Sallins bypass.”*

2.8 On the basis of the foregoing it is understood that the modelling undertaken to inform the Draft Strategy took account of the notional projected buildout of our client's lands in their entirety for the uses promoted for that location within the (now withdrawn) LAP, i.e. a data centre campus, which as outlined in Section 3, would not have an adverse impact on the proximate Junction 10 due to the low intensity nature of the use.

This is included as an appendix to the final Naas/Sallins Transport Strategy Report.

Model fully developed and calibrated and validated in line with TII PAG Guidance. Please refer to the model validation and calibration report included as an appendix to the final Naas/Sallins Transport Strategy Report.

The Naas/Sallins Transport Strategy mainly supports public transport, cycling and walking interventions which benefit Naas town centre. Peripheral developments do not impede on these objectives.

The development of significant land banks on the periphery of the town centre and heavily reliant on the National Road Network for access is contrary to planning policy and guidance set out by TII and the NTA and OPR. Please refer to Appendix B.2 of the Naas/Sallins Transport Strategy Report.



2.9 Chapter 13 of the Draft Strategy relates to strategy implementation. This section describes key planning principles for each relevant transport mode which should be considered during the redesign of existing areas and the design of future development areas to ensure the prioritisation of sustainable modes. Section 13.2.2 relates to public transport planning principles and states the following: *“Jobs located in central areas and along radial links are the easiest to service with bus routes and future high intensity employment uses (e.g. offices, public/commercial services, hotels, etc.) should be focused in these areas. Peripheral employment centres on orbital links will guarantee a high mode share for cars as they are serviced by few bus routes and are too far away for active modes – such locations should be reserved for employment types that are land extensive with relatively low employment generation such as warehousing.”*

2.10 The foregoing section of the Draft Strategy is considered relevant in the context of the lands in our client’s ownership which are suited to the development of such extensive, lower intensity employment uses such as data centres.

2.11 The following section of this submission outlines several suggestions and amendments to the Draft Transport Strategy in its current form.

3.0 SUGGESTED AMENDMENTS TO THE DRAFT NAAS / SALLINS TRANSPORT STRATEGY

3.1 Our client welcomes the opportunity to comment on the Draft Transport Strategy. This section of the submission document suggests specific amendments to the Draft Strategy document as presented for public consultation. It is noted that several sections of the document have not yet been made available for consultation (as they remain under preparation), with several of the technical appendices also not yet made available. Our client would welcome any opportunity to consult further on the document as it reaches a more advanced stage, including on any amendments made on foot of the current second round of non-statutory consultation.

Study Area Boundary

3.2 As set out above, the study area for the Transport Strategy is outlined in Figure 2.1 of the Draft Strategy document. Whilst we acknowledge that this figure is an indicative high level image, it is noted that the boundary of the study area bisects the lands in our client’s ownership, despite these lands having been zoned under the now withdrawn LAP for the area, and despite the fact that the subject lands are among the lands considered for the purposes of the traffic modelling which forms part of the Transport Strategy.

3.3 On this basis, it is submitted that the study area boundary for the purposes of the Transport Strategy should be amended to take in the subject lands in the ownership of our client in their entirety. This could be achieved via a slight alteration of Figure 2.1 of the draft document, to clearly indicate the inclusion of the subject lands in full.

3.4 This will ensure consistency between the representation of the study area boundary, and the extent of modelling and the studies within the Strategy document and align with the land use zonings / settlement boundary of the now withdrawn Draft Naas and Environs LAP. A mark-up of Figure 2.1 is provided below, including the suggested amendment to the study area boundary which would achieve this consistency.

There is no reason to extend the Study Area boundary. The development of significant land banks on the periphery of the town centre and heavily reliant on the National Road Network for access is contrary to planning policy and guidance set out by TII and the NTA and OPR. Please refer to Appendix B.2 of the Naas/Sallins Transport Strategy Report.

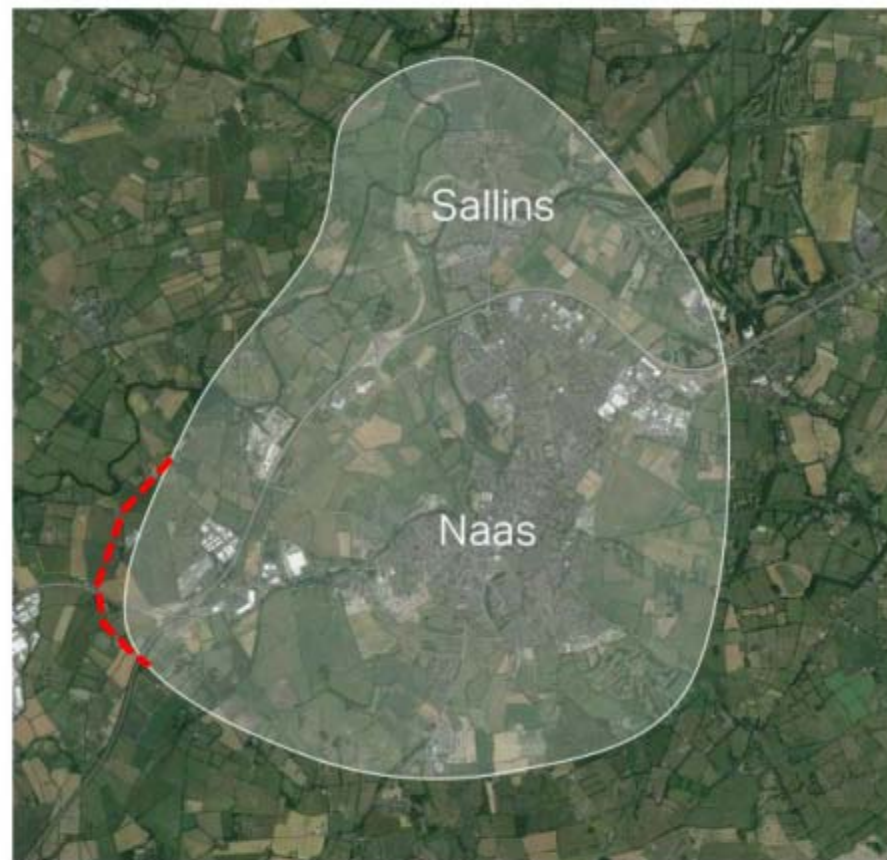


Figure 3.1: Suggested amendment to Figure 2.1 of the Draft Transport Strategy, to include lands at Ladytown. Suggested extension of study area boundary indicated in red.

Recognition of Low Intensity Employment Potential at Ladytown

3.5 As set out briefly above, it is noted that the traffic modelling for future scenarios undertaken for the Draft Strategy take account of the projected build out of our client's landholding in its entirety in accordance with the zoning provided for under the now withdrawn 2019-2023 LAP.

3.6 That zoning under the now withdrawn LAP provided for the development of the subject lands for enterprise and employment uses, with a specific zoning provision restricting the development of the lands to large-scale data centre development, given the specific characteristics of the site, infrastructural assets and low-trip generation of such a land use.

3.7 The zoning of the subject lands for data centre development was considered appropriate having regard to the specific infrastructural assets of the subject lands, the low intensity of such uses and the consequentially minor traffic impacts precipitated by such uses.

3.8 It is respectfully submitted that the next iteration of the Transport Strategy should specifically recognise and expressly note that the subject lands at Newhall have been identified for datacentre use under the now withdrawn LAP, and that their development in full for such a use has been factored into the growth modelling under the VISUM Model prepared to inform the Transport Strategy.

Low trip intensity predicted at these locations in the modelling undertaken.

Significant opposition from TII and OPR to previous LAP.

The development of significant land banks on the periphery of the town centre and heavily reliant on the National Road Network for access is contrary to planning policy and guidance set out by TII and the NTA and OPR. Please refer to Appendix B.2 of the Naas/Sallins Transport Strategy Report.



3.9 It is respectfully submitted that the inclusion of such a reference would be appropriate within Section 9.3 (page 99) of the Draft Transport Strategy document. A suggested wording for this change is provided below, with existing text from the Draft Strategy in italics, and additional suggested text in bold and underlined. *“Future year models (2023 and 2030) were developed in conjunction with Kildare County Council’s Planning Section based on projected land uses and population/employment projections for each traffic model zone. The future year assessments are based on the full build out of the withdrawn-draft Naas LAP 2019- 2023. Whilst it is recognised that these land-use zonings, particularly those on the periphery of the town, are likely to change in the future draft Naas LAP 2021 to 2027, the main objective of the roads/traffic interventions in the Naas/Sallins Transport Strategy is to remove unnecessary traffic from Naas’s town centre and give it the opportunity to re-develop as a retail and commercial centre. Future changes to land use zonings on the periphery of the town are unlikely to have significant impacts on the appropriateness of the assessment in selecting interventions which benefit Naas town centre. The future year modelling has taken into account a projected full build out of lands to the north of the Newhall interchange at Ladytown for datacentre development. Figure 9.2 shows the zone structure for the Naas LAM which was informed by the withdrawn-draft Naas Local Area Plan 2019 – 2023 land use zonings. Full details of the development, calibration, validation and future year forecasting for the Naas LAM are provide in the Naas LAM Traffic Modelling Report which is provided as Appendix B.”*

3.10 While the detail of the modelling and the assumptions made regarding the full build out of the subject lands are not available (technical Appendix B of the Draft Transport Strategy having not been published), it is considered that the final modelling of traffic generation for the full build out of these lands should be cognisant of the comparatively low levels of traffic generation associated with datacentre development and such uses.

3.11 The reason for this relatively low level of traffic generation is the space extensive nature of datacentre development, with a low intensity of use provided across the large sites needed to accommodate such development due to established layout, security and design requirements of large-scale datacentre operators.

3.12 This point is illustrated in the table included below (prepared by CSEA Consulting Engineers) which provides examples of the employment levels and typical trip generation of similar large scale data centre developments within the operational areas of other Planning Authorities. This serves to illustrate the negligible impact that such uses have on nearby levels of traffic and existing and planned road infrastructure.

MP Ref	LGA	Land Area of Masterplan site	No. data centre buildings on masterplan site			Total GFA of Data Centre Buildings within Masterplan Development	Max Staff on-site at any given time during operation	Masterplan Trip generation (veh)			
			Single storey	Two-Storey	Total			AM		PM	
								in	out	in	out
1	Meath Co. Co.	190,000m ²	0	3	3	85,000m ²	150	60	30	12	12
2	Fingal Co. Co.	260,000m ²	1	5	6	110,000m ²	300	109	53	24	24
3	Dublin City Co.	145,000m ²	1	3	4	65,000m ²	166	99	18	8	68
4	Dublin City Co.	85,000m ²	0	2	2	30,000m ²	100	39	18	8	8

Table 3.1: Details of trip generation and employment levels in comparable data centre developments (prepared by CSEA Consulting Engineers)

Please refer to the appendices of the final Naas/Sallins Transport Strategy Report.



3.13 It is respectfully submitted that the final Transport Strategy and its associated technical appendices (which have not yet been made available for review or comment) should take account of the comparatively low projected trip generation which would be precipitated by the full build-out of the subject lands for their intended use, which in turn will inform the forthcoming Naas and Environs LAP. This should be taken into consideration within the final modelling and traffic projections, and it would be appropriate to refer specifically to the development of the lands for datacentre uses as provided in the suggested wording set out above. Planning Principles to Support the Strategy

3.14 As noted above, Chapter 13, and in particular section 13.2.2 sets out principles in relation to public transport to inform development control and urban design.

3.15 A revision to the fifth bullet-point of section 13.2.2 is respectfully suggested as set out below, to ensure that the final Transport Strategy adequately reflects the appropriateness of lands such as those in our client's ownership for space extensive, less intensive employment uses such as datacentre development. A suggested wording for this change is provided below, with existing text from the Draft Strategy in italics, text to be deleted struck through, and additional suggested text in bold and underlined. *“Jobs located in central areas and along radial links are the easiest to service with bus routes and future high intensity employment uses (e.g. offices, public/commercial services, hotels, etc.) should be focused in these areas. Peripheral existing and new employment areas centres on orbital links will guarantee a high mode share for cars as they are serviced by few bus routes and are too far away for active modes – such locations should be reserved for employment types that are land extensive with relatively low employment generation such as warehousing.”*

3.16 The above suggested change to the wording of the Draft Transport Strategy will ensure that the final document adequately reflects the suitability of lands such as those at Ladytown in the ownership of our client for low intensive employment uses such as data centre development (which is now a well-established land use in Ireland). As noted previously, these lands are well suited to space extensive, lower intensity employment uses such as datacentre development having regard to their locational characteristics (in terms of road access and services provision), and the comparatively low trip generation precipitated by such uses.

4.0 CONCLUSION

4.1 This submission on the Draft Naas / Sallins Transport Strategy has been prepared on behalf of our client, Crylock Developments Ltd., Newhall, Naas, Co. Kildare, in response to the ongoing second phase of non-statutory consultation as part of the Transport Strategy preparation process.

4.2 The submission seeks to highlight and suggest amendments to the Draft Transport Strategy document to reflect the contents of the withdrawn Draft LAP in respect to lands at Ladytown, Newhall and their suitability for large scale data centre development. These suggested amendments are limited in their scope, however as set out above they are considered appropriate to ensure the development potential of lands at Newhall for lower intensity employment use, specifically data centre development (given the infrastructural assets of the subject lands), which would have an insignificant impact on local transport capacity, and a significant positive impact in terms of economic development for the area, is realised.


4.3 We trust that the contents of this submission will be taken into consideration by the Planning Authority and their consultants during the next stage of the Transport Strategy preparation process. Please do not hesitate to contact us if you have any queries regarding this submission.

Low Trip Generation has been assessed. The development of significant land banks on the periphery of the town centre and heavily reliant on the National Road Network for access is contrary to planning policy and guidance set out by TII and the NTA and OPR. Please refer to Appendix B.2 of the Naas/Sallins Transport Strategy Report.

This comment is not accepted. This is against National Policy of peripheral development. There is limited access via public transport, cycle and walking. Proposed wording is not in accordance with National and Regional Policy in terms of urban development. Opposition from TII, OPR and NTA.



7.19 Glenveagh Homes Ltd. Submission & Response

Glenveagh Homes Ltd. Submission	KCC Response
<p>1.0 INTRODUCTION</p> <p>1.1 We refer to the 'Draft Naas/Sallins Transport Strategy' prepared by AECOM on behalf of Kildare County Council and the 'Phase 2' Public Consultation inviting responses to this by 19th June 2020.</p> <p>1.2 Glenveagh Homes Ltd., Maynooth Business Campus, Maynooth, Co. Kildare has instructed John Spain Associates to prepare this submission on their behalf and welcomes the opportunity to make this submission on the draft Transport Strategy for Naas/Sallins. Please accept this submission as a formal response to this consultation process.</p> <p>1.3 This submission is made in response to the non-statutory public consultation process being undertaken in respect of the draft Transport Strategy document, prepared by AECOM. A summary public consultation document has also been prepared and published, and the current submission has regard to the contents of that document.</p> <p>1.4 Our Client is the owner of c. 14.3 hectares of zoned land located in the western part of Naas with primary access gained from the distributor link road which defines the site's western perimeter. This road also serves Volvo and Kerry Group business premises which are located a short distance to the north. The M7 motorway linking Dublin and Limerick lies a short distance to the west, enhancing the accessibility of the site. Business parks at Millennium Park and Newhall are located short distances to the north and south respectively. Naas town centre lies approximately 1.85km to the south east, as the crow flies.</p> <p>Figure 1 Glenveagh Landholding</p> 	



2.0 KEY POINTS OF SUBMISSION

2.1 Our client supports the preparation of the Transport Study which will underpin the Draft LAP and strategic planning framework for the area. In particular, our client supports the route of the Bus Priority street which is aligned along the boundary of our client's lands as set out in Figure 8.23 (copied overleaf). This route also provides a key permeability linkage (PERM35) and walking and cycle route (C16). It is important that this route is retained and prioritised in the Transport Strategy so these key linkages are provided for and allow future development lands to connect into this structuring element of the road infrastructure for the area.

2.2 It is respectfully submitted that the Millennium Park area should promote the public transport route in the short term, which will link Sallins Train Station to the north and the centre of Naas to the south. In this regard, consideration and determination of the bridge access required to link this route with central Naas should be pursued as an immediate priority having regard to the tangible benefits arising from the route. Critical to this is the range and mix of uses in the area which should include an appropriate quantum of residential zoned land to underpin the investment in the public transport link rather than monotype employment/industrial uses.

2.3 It is considered that the proposed link responds positively to and will assist in achieving the Strategy Objectives set out in the draft Transport Strategy relative to Roads Transport Measures, as well as Public Transport, Cycling and Walking infrastructure, whilst also facilitating and enabling the advancement of development in the northwest quadrant in Naas in a sustainable fashion.

2.4 The proposals will also enhance connectivity through the north western part of Naas for cyclists and pedestrians by the implementation of a link which will help to prioritise sustainable modes of travel. This will improve access from the town to the Train Station at Sallins as well as providing sustainable connectivity between employment and residential lands.

The point is accepted

While Kildare Co. Co. would like to achieve the proposed objectives of the Naas Transport Strategy, it must be remembered that the LAP will have to be adopted before many of the objectives can be pursued. In addition, resources including funding will have to be sourced. In fact, the participation of the parties with development interests will be needed to achieve the goals of the LAP.



2.5 From a strategic perspective the provision of a Bus Priority street between the town centre and Sallins Train station would benefit the whole town of Naas and improve public transport participation rates through the provision of a dedicated and direct route to Sallins Train Station. This should be an immediate priority for the town both providing both sustainable linkages and unlocking suitable development lands.

2.6 It is submitted that there is a recognised need in the National Planning Framework (NPF) to align investment in infrastructure, with housing and employment in appropriately located settlements. It is considered that Naas, identified as a 'Key Town' located on the M7 Economic Corridor, is strategically located to assist in providing for future population and housing growth in a sustainable manner.

2.7 The proposed new public transport link between the town centre and Sallins Train Station will also assist in the provision of access and servicing of the lands which it bisects and enable its activation for future residential development contributing to the sustainable and sequential growth of Naas in accordance with the objectives of the National Planning Framework, its Appendices and the zoning guidance as set out in the DoHPLG's Local Area Plan Guidance Manual. To await delivery of future development in the area before advancing this proposal – as implied in the draft Transportation Study – would, with respect, be a lost opportunity as any such development might be deemed premature pending delivery of this key infrastructure.

We note the point.



2.8 Significantly, we note that the route is confirmed as a “High” importance as a cycle route serving significant employment provision (e.g. Kerry Group) as well as a new residential quarter and the future Naas Community College (Table 10.6; page 169).

2.9 We do however note a potential conflict in the draft Study in respect of this Northwest Quadrant Link Street. Whilst it scored relatively low (8th) as a new road proposal taken in isolation (rather than cumulatively) in terms of reducing impacts on town centre traffic, it scores very high in terms of permeability and connectivity to the train station via public transport, cycling and walking. We would further add to this that it serves to open up key linkages to and between significant employment, education and residential lands, which should be a significant weighting factor in determining the relative importance of various options and the timing of their delivery. In terms of economy, the route will more than pay for itself from the development potential and associated levies it releases as well as the significant social, environmental and transport planning benefits that arise.

2.10 However, whilst the significant value of the route is recognised, when translating this into phasing strategy (see page 205), there is potential for confusion whereby the route is both listed as a short/medium term measure, whilst also being “delivered as part of road scheme” that is not being brought forward. This, we submit, should be rectified in the adopted Transportation Study and the route prioritised, including details of the associated bridge access for busses.

2.11 Bearing in mind the significant advantages of sustainable public transport/ cycle/ pedestrian linkages between Naas Town Centre together with facilitating both existing and potential development lands along its route for connected employment, residential and educational uses, we submit that route Option 5 (Perm 35/ C16) should be prioritised as a short to medium-term measure and clarity provided regarding its delivery as a ‘road scheme’ with an N/A delivery timeline.

2.12 The proposed public transport link will increase the modal share of public transport and assist in achieving the Regional Spatial and Economic Strategy Policy Objective 5.3 to plan and design future development in the Dublin Metropolitan Area *‘in a manner that facilitates sustainable travel patterns with particular focus on increased the share of active modes (walking and cycling) and public transport use and creating a safe street environment for pedestrians and cyclists’* and to a broader extent, the content of the Greater Dublin Area Transport Strategy 2016-2035.

2.13 It will also assist in achieving the Regional Policy Objective 4.48 by improving the transport network within and serving Naas town including delivery of *‘a robust and efficient walking, cycling and bus network’*, and supporting an enhanced role for Naas as *‘a hub for high employment, residential and amenities’* in accordance with RPO 4.53.

The points are noted. It should be noted that the objectives of the new LAP will be achieved through a series of individual projects and these will involve compliance with the Public Spending Code.

It is not specifically proposed in the report that this scheme is short/medium term. Any planned road or greenway is shown on all of the maps (short, medium and long term) as their timeframes are more uncertain. The report states “The short term permeability measures are shown in Figure 13.1 along with the N/A timescale measures which are part of separate road or greenway schemes.” Although this scheme is not being brought forward as a roads intervention, it is being brought forward as a bus priority measure, as a public transport / active travel only street. Details of the scheme will be addressed at detailed design stage.

The point is noted.



Figure 3 – Short Term Permeability Measure (No. 35) linked with Separate Road Scheme

The short term permeability measures are shown in Figure 13.1 along with the N/A timescale measures which are part of separate road or greenway schemes.



Figure 13.1 Short Term Permeability Measures and Greenway or Road Schemes



3.0 CONCLUSIONS

3.1 This submission on the Draft Naas / Sallins Transport Strategy has been prepared on behalf of our client, Glenveagh Homes Ltd., Maynooth Business Campus, Maynooth, in response to the ongoing second phase of non-statutory consultation as part of the Transport Strategy preparation process.

3.2 Glenveagh supports the analysis and assessment provided in the draft Transport Study and its recommendations for sustainable infrastructure delivery and requests that permeability measure no. 35 and the Northwestern Quadrant Link Street be advanced as a priority, both for its listed benefits in providing sustainable linkages, but more significantly, its potential to unlock important landbanks for high employment, residential and amenity uses that benefit from sustainable interconnectivity. To provide for coordinated spatial development, this should be infrastructure led to facilitate supporting residential/employment development rather than the other way around. Whilst the route will incur significant upfront costs, it will more than pay for itself from the development potential and associated levies it releases as well as the significant social, environmental and transport planning benefits that arise.

3.3 Our client would welcome the opportunity to discuss further how the development of the public transport route can be delivered in the context of the wider strategic nature of the lands.

3.4 It is respectfully requested that this submission be taken into consideration in the preparation of a final Transport Strategy for Naas/Sallins, and we look forward to the publication of this in due course.

The point is noted. The funding of individual projects will have to be considered once the LAP has been adopted. This will allow for a prioritisation of the schemes to be carried forward.

It is expected that Kildare Co. Co. will consult with interested parties and stakeholders in bringing the objectives of the new LAP forward as individual projects.



7.20 ARUP (North-West Quadrant) Submission & Response

ARUP (North-West Quadrant) Submission (summary only)	KCC Response
<p>We are broadly supportive of the vision of the Draft Transport Strategy, however in articulating this vision, we offer the following recommendations, based on of long-standing public planning policies supporting the development of the Northwest Quadrant lands.</p> <p>1. The Draft Transport Strategy should be reviewed to ensure that it is flexible enough to support longstanding land-use policy, specifically providing for the sustainable growth of Naas through the development of the Northwest Quadrant as a compact urban extension of Naas facilitating balanced mixed use development, including employment, residential and supporting social uses.</p> <p>2. It is recommended that specific objectives relating to future planned development or lands zoned for development, and the provision of sustainable transport infrastructure to facilitate same, should be included in the Draft Transport Strategy, to ensure an integrated approach to land-use and transportation planning is adopted.</p> <p>3. It is recommended that the bus interchange within Market Square be progressed as the town centre bus interchange. It is recommended that the long term objective to provide a secondary interchange within the Harbour Area facilitating inter-city buses be revised to consider an alternative location in proximity to the proposed second Sallins and Naas Railway Station and park and ride facility.</p> <p>4. It is recommended that the alignment of the Western Spine local bus route be referenced as an indicative alignment.</p> <p>5. It is recommended that the bus only route through the Northwest Quadrant lands is replaced with a street proposal along this indicative alignment in combination with bus gate in the canal harbour area. It is also recommended that other sustainable modes, including walking and cycling, be facilitated by any new public transport connection across the Grand Canal.</p> <p>6. It is recommended that the proposed sustainable travel bridge should be removed from the strategy and replaced with a scheme that provides priority to sustainable modes along the existing alignment of the R407.</p>	<p>The Naas / Sallins Transport Strategy does not preclude the development of the northwest quadrant. Rather it attempts to strike a balance between an appropriate level of development in this location whilst protecting the strategic function of the National Road Network and the new junction 9A. It should be noted that National Planning Policy now promotes the development of our traditional town centres rather than promoting development peripheral to the town centre, indeed the National Planning Framework explicitly states : "A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages." Notwithstanding this, Appendix B.2 of the draft strategy has assessed a range of land use scenarios a future year 2030 for the Northwest Quadrant. Whilst the full build out of zoned lands was seen to create issues at Junction 9A, an alternative scenario (referred to as the "Preferred Scenario" in Appendix B.2) was outlined as being more appropriate. The preferred scenario allowed for 2,810 jobs (total) in the Northwest Quadrant as opposed to 4,230 in the full build out scenario. Therefore, significant future development potential has been allowed for in Northwest Quadrant.</p> <p>The draft Strategy has made significant attempts to address this requirement. A dedicated public transport only link connecting Naas town centre to Junction 9A and on to Sallins Train has been allowed for.</p> <p>There is no benefit to providing a public transport interchange in this location. It is not easily accessible to a large population through cycling and walking.</p> <p>Noted and agreed.</p> <p>Noted. The delivery of vehicular access to these lands will be a function of land zoning and subsequent planning applications. However, the ambitions of the public transport only link are to give public transport priority in these locations.</p> <p>There are significant width constraints along the R407 that are not conducive to providing bus priority. Additionally, the single bridge over the N7 acts as a barrier to providing public transport priority.</p>



<p>7. It is recommended that the assessment of the North West Quadrant Link be revised to address the function of this link in providing local accessibility and activity to the Northwest Quadrant lands. We fully support that this link should only be connected across the canal to the town centre for public transport and active modes and recommends that a bus gate in the vicinity of the harbour area be provided to facilitate this objective.</p>	<p>Noted. The delivery of vehicular access to these lands will be a function of land zoning and subsequent planning applications. However, the ambitions of the public transport only link are to give public transport priority in these locations.</p>
<p>8. It is recommended that the objective to deliver the Millbridge Road be considered in the context of the full build out of the Northwest Quadrant lands, and that the alignment be included as indicative.</p>	<p>Noted and agreed the alignment is indicative.</p>
<p>9. It is recommended an objective be included in the Draft Transport Strategy that cyclists be removed from potential conflict at the junction between the Western Distributor Road and the Distributor Link Road, by crossing eastbound cyclists to the southern side of the carriageway.</p>	<p>This is a matter for TII to address.</p>
<p>10. It is recommended that alternative, more complementary land-use proposals for the Northwest Quadrant lands be tested, including the 2017 Masterplan Update proposal. It is also recommended that the phrase 'reduced development' be removed from the Draft Transport Strategy in relation to the Northwest Quadrant.</p>	<p>Appendix B.2 of the draft strategy has assessed a range of land use scenarios a future year 2030 for the Northwest Quadrant. Whilst the full build out of zoned lands was seen to create issues at Junction 9A, an alternative scenario (referred to as the "Preferred Scenario" in Appendix B.2) was outlined as being more appropriate. The preferred scenario allowed for 2,810 jobs (total) in the Northwest Quadrant as opposed to 4,230 in the full build out scenario. Therefore, significant future development potential has been allowed for in Northwest Quadrant.</p>
<p>11. Given the apparent significant disparity between the impact shown in the NQW from the modelling work undertaken on behalf of KCC for the M7 Osberstown Interchange and R407 Sallins Bypass and that contained in the Draft Transport Strategy, we recommend that this is revisited in detail, including finalising the requirements for the appropriate completion of the Interchange Distributor Link Road and the upgrading of the Western Distributor Road / Distributor Link Road Roundabout to ensure that appropriate balanced development within the NWQ is not in any way restricted.</p>	<p>Please provide clarity on the "significant disparity" being referenced here.</p>
<p>12. Kildare County Council should review in detail how the M7 Osberstown Interchange Distributor Road has been constructed and to provide for the upgrading of its junction with the Western Distributor Road in order to ensure compliance with the conditions (Conditions 1 and 4b specifically) attached by An Board Pleanala (ABP Reference No. 09.HA0046) to the motorway scheme.</p>	<p>This is a matter for TII to address.</p>



7.21 RPS (North-West Quadrant) Submission & Response

RPS (North-West Quadrant) Submission (summary only)	KCC Response
<p>Our client, Millennium Properties Limited Partnership, the owner of lands within the Naas Northwest Quadrant, Naas, County Kildare welcomes this opportunity to comment on the <i>Draft Naas/Sallins Transport Strategy</i>.</p> <p>On the basis of long-standing public planning policies our client has invested significantly in public infrastructure serving Naas and the Northwest Quadrant including in excess of €16 million for the design and planning phases and towards the construction of the M7 Osberstown Interchange and the Sallins By-pass.</p> <p>We have supported a shared vision with Kildare County Council for the Northwest Quadrant which for us is:</p> <p><i>“to create a vibrant and bustling town expansion, wholly integrated with the fabric of Naas, offering a diverse mix of activities and providing the ideal work-life balance without the onus of long commuting”.</i></p> <p>All necessary major infrastructure to serve the development of the Naas Northwest Quadrant as a strong employment zone with new residential neighbourhoods is now in place or is nearing completion. Such a level of public and private investment demands appropriate and sustainable local transport and land use planning policy, consistent with long-standing objectives for Naas and the Northwest Quadrant, be put in place to fully utilise the opportunities associated with such investment.</p> <p>Current statutory land use policy specifically supports:</p> <ul style="list-style-type: none"> • Significant population and employment growth within Naas; • NWQ as a key location for the growth of Naas; • Provision of sustainable transport linkages connecting the NWQ to the centre of Naas and the Sallins and Naas Railway Station; and • Provision of the M7 Osberstown Interchange within the NWQ to facilitate, inter alia, the delivery of a strong employment zone with new residential neighbourhoods. 	<p>The draft Strategy has made significant attempts to address this requirement. A dedicated public transport only link connecting Naas town centre to Junction 9A and on to Sallins Train Station has been allowed for.</p> <p>It should be noted that National Planning Policy now promotes the development of our traditional town centres rather than promoting development peripheral to the town centre, indeed the National Planning Framework explicitly states : "A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages." Notwithstanding this Appendix B.2 of the draft strategy has assessed a range of land use scenarios a future year 2030 for the Northwest Quadrant. Whilst the full build out of zoned lands was seen to create issues at Junction 9A, an alternative scenario (referred to as the "Preferred Scenario" in Appendix B.2) was outlined as being more appropriate. The preferred scenario allowed for 2,810 jobs (total) in the Northwest Quadrant as opposed to 4,230 in the full build out scenario. Therefore, significant future development potential has been allowed for in Northwest Quadrant.</p>



This policy framework and our vision for the NWQ resonates with the submission by the National Transport Authority to the *Draft Naas Local Area Plan 2019 – 2023* which noted that:

“lands to the south of the N/M7 such as the NWQ lands (emphasis added) would be more suitable for trip-intensive development, as they have the potential to contribute to a compact and consolidated urban form that supports the use of sustainable transport modes”

The addition of the new interchange and upgrading of others improves and provides much better balance to Naas’s connectivity to the National Road Network. This supports more orbital movement (via the Naas Ring Road, including Millennium Link Road), affords the opportunity to remove through traffic the town centre and creates the opportunity for planned, compact urban development within the NWQ.

Having regard for current statutory land use policy and following large scale investment to support the development of the NWQ our client is extremely concerned that the current *Draft Naas/Sallins Transport Strategy* is not wholly in accordance with, or fails to be sufficiently integrated with existing statutory land use policy.

More specifically, our client is concerned that the designation of the NWQ as a key growth area for the future expansion of Naas in regional and local planning policy is only fleetingly referenced in the Draft Transport Strategy and there is no clear identification or prioritisation of the transport policy and infrastructural provision necessary to provide for the development of the NWQ.

Our client is also concerned that a number of general planning principles espoused in the Draft Transport Strategy have not been sufficiently considered in the particular context of Naas. The application of these general principles may lead to difficulties in the provision of high intensity employment within the NWQ. Such an outcome would be contrary to long-standing strategic land use policy and would hinder the development of Naas as a regionally important employment centre, as designated in the *Regional Spatial and Economic Strategy 2019 - 2031*. Limiting vehicular access from the Osberstown Interchange and the Sallins Bypass to the NWQ, as appears to be proposed, is contrary to local planning policy and the rationale for the permission for the Interchange as set out in the An Bord Pleanála Inspector’s Report for the M7 Osberstown Interchange and R407 Sallins Bypass Scheme (ABP Reg. Ref. 09.HA0046 M7, 09.MA0013 and 09.KA0031). In addition to its strategic role, the Osberstown Interchange and Sallins Bypass should facilitate the development of the NWQ and provide for bus service and cycle / pedestrian linkages from Naas town centre to Sallins and Naas Railway Station via Millennium Park and local vehicular access to the NWQ.

The uncertainty regarding the scheduling of delivery of bus services from Naas Town Centre to the Naas and Sallins Railway Station via the NWQ hinders the development of the NWQ and fails to provide sustainable transport mode choice.

The Naas/Sallins Transport Strategy does not undermine this aspiration. However it should be noted that National Planning Policy now promotes the development of our traditional town centres rather than promoting development peripheral to the town centre, indeed the National Planning Framework explicitly states : "A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages."

KCC reject this statement. The draft Strategy has made significant attempts to address this requirement. A dedicated public transport only link connecting Naas’s town centre to Junction 9A and on to Sallins Train has been allowed for. It should be noted that National Planning Policy now promotes the development of our traditional town centres rather than promoting development peripheral to the town centre, indeed the National Planning Framework explicitly states : "A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages."

The draft strategy does not limit vehicular access from Osberstown interchange. However, it does attempt to strike a balance between an appropriate level of development in this location whilst protecting the strategic function of the National Road Network and the new junction 9A.

Should significant development occur in this location in advance of a corridor from Naas’s town centre being delivered, local bus services utilising the existing road network can be examined.



The basis of the modelling exercise which has been undertaken is not adequately outlined. The status of the recommendations arising from this modelling, described in a technical appendix, is unclear. The recommendations themselves, regarding reduced development within the NWQ, are wholly contrary to established land use policy and the rationale for the permission for the Osberstown Interchange. They are entirely inappropriate and crude in planning terms and would:

- Severely limit the growth of Millennium Park, seriously undermining the employment policies set out in the RSES (RPO 4.51);
- Be contrary to the long established designation of the NWQ as a key growth area for Naas; and
- Undermine the very designation of Naas as a Key Town.

Overall, the *Draft Naas/Sallins Transport Strategy* places too much emphasis on “*limiting vehicular access from the Osberstown Interchange*” and suggested potential restrictions on development, the result of which will be continued truncation of the development potential of Naas in line with *Regional Spatial and Economic Strategy*. Local distributor and street access should be established off the existing Millennium Link Road junctions, based on the principles of permeability rather than attracting through traffic or vehicular connectivity into the centre of Naas. Similarly, public transport service provision can be accommodated with connectivity to centre the of Naas and the Naas and Sallins Train Station. Regarding the latter, we fully support the provision of a new rail station for Naas located adjacent to the new Sallins Bypass, which has been designed to facilitate a station and Park and Ride Facility.

In order to address these concerns and ensure the opportunity that exists to create a sustainable compact urban extension of Naas within the NWQ is grasped the following recommendations are made:

Recommendation 1: The Draft Transport Strategy should be reviewed to ensure that it is more fully integrated with current statutory land use policy specifically providing for:

- Significant population and employment growth in Naas;
- The further development of NWQ as a centre for mixed use development, including employment (to include high intensity employment) and residential growth; and
- The early delivery of pedestrian, cycle, public transport and vehicular linkages servicing the NWQ.

Recommendation 2: All planning principles pertaining to the location of high intensity employment should recognise the suitability of the NWQ, proximate to Naas Town Centre and the Sallins and Naas Railway Station, as an appropriate location for high intensity employment. This should be referenced in the Draft Transport Strategy.

Recommendation 3: The opportunity to develop the NWQ as a mixed-use community should be identified and actively supported in the Draft Transport Strategy.

Appendix B.2 of the draft strategy has assessed a range of land use scenarios a future year 2030 for the Northwest Quadrant. Whilst the full build out of zoned lands was seen to create issues at Junction 9A, an alternative scenario (referred to as the “Preferred Scenario” in Appendix B.2) was outlined as being more appropriate. The preferred scenario allowed for 2,810 jobs (total) in the Northwest Quadrant as opposed to 4,230 in the full build out scenario. Therefore, significant future development potential has been allowed for in Northwest Quadrant.

KCC are required to comply with policy set at a national and regional level such as the NPF and RSES. The draft strategy does not limit vehicular access from Osberstown interchange. However, it does attempt to strike a balance between an appropriate level of development in this location whilst protecting the strategic function of the National Road Network and the new junction 9A.

Appendix B.2 of the draft strategy has assessed a range of land use scenarios a future year 2030 for the Northwest Quadrant. Whilst the full build out of zoned lands was seen to create issues at Junction 9A, an alternative scenario (referred to as the “Preferred Scenario” in Appendix B.2) was outlined as being more appropriate. The preferred scenario allowed for 2,810 jobs (total) in the Northwest Quadrant as opposed to 4,230 in the full build out scenario. Therefore, significant future development potential has been allowed for in Northwest Quadrant.

The early delivery of pedestrian/cycle, public transport and vehicular access to these lands will be a function of land zoning and subsequent planning applications.

Noted, however it is not the purpose of the NSTS to specifically develop one area of Naas in preference to others. The development of the NWQ should be discussed with the Planning Department of KCC.

Noted. This is a matter for the zoning in the LAP to address rather than the transport strategy.



Recommendation 4: The Osberstown Interchange is being constructed, *inter alia*, with the purpose of facilitating the development of Naas and the NWQ. The Draft Transport Strategy should explicitly acknowledge this. The current reference to the strategic role of the Osberstown Interchange as set out in paragraph 13.2.3 (page 212) of the Draft Strategy is ambiguous and could be interpreted to hinder the role and development of the NWQ.

Recommendation 5: The delivery of the road between the M7 Junction 9A on the Millennium Link Road and Naas harbour and a bus service between the Naas Town Centre and Sallins and Naas Railway Station via the NWQ should be prioritised, with services being provided in tandem with the development of the lands.

Recommendation 6: There are serious concerns regarding the recommendations of the traffic model developed for Naas/Sallins as part of the Naas Transport Strategy to test the impacts of the land use proposals contained within the future draft LAP 2021 to 2027. The recommendations set out in Appendix D are wholly contrary to the long established land use and planning strategies and policies for Naas and are entirely inappropriate and crude in planning terms. They would:

- Severely limit the growth of Millennium Park, seriously undermining the employment policies set out in the RSES (RPO 4.51);
- Be contrary to the long established designation of the NWQ as a key growth area for Naas; and
- Undermine the very designation of Naas as a Key Town.

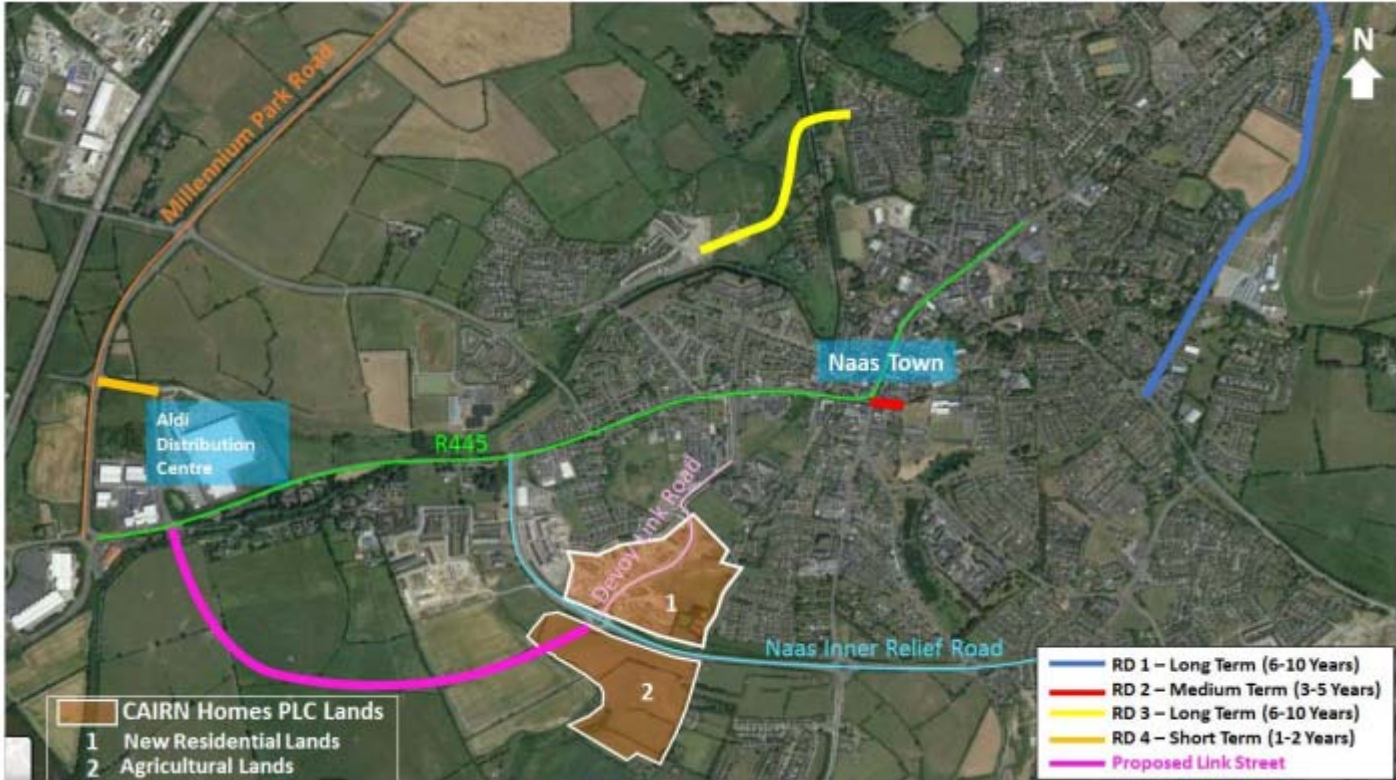
Transport Infrastructure Ireland have explicitly outlined to KCC that the strategic function of the national road network and associated junctions should be protected.

Noted and agreed. However, this would be a function of financial resource availability.

Appendix B.2 (formerly Appendix D) of the draft strategy has assessed a range of land use scenarios a future year 2030 for the Northwest Quadrant. Whilst the full build out of zoned lands was seen to create issues at Junction 9A, an alternative scenario (referred to as the "Preferred Scenario" in Appendix B.2) was outlined as being more appropriate. The preferred scenario allowed for 2,810 jobs (total) in the Northwest Quadrant as opposed to 4,230 in the full build out scenario. Therefore, significant future development potential has been allowed for in Northwest Quadrant.



7.22 Cairn Homes Submission & Response

Cairn Homes Submission (summary only)	KCC Response
<p>EXECUTIVE SUMMARY</p> <p>Cairn Homes Properties Ltd. welcome the opportunity to provide a submission on the Draft Naas/Sallins Transport Strategy. Cairn Homes have a track record in delivering previous road objectives in Naas (Devoy Link street) and indeed elsewhere in Kildare (Maynooth) in tandem with the development of lands.</p> <p>Recommended Link Street Objective</p> <p>This submission primarily relates to the recommendation to include a link street objective between the R447 southern ring road at Jigginstown and the R445 Newbridge Road in the emerging Naas/Sallins Transport Strategy. It is considered that the inclusion of a link street will provide a strategic and deliverable link in the southern part of Naas as part of the sequential and sustainable development of Naas. It is recommended that the proposed link street should be an integral objective of the Transport Strategy and given full regard in the technical analysis being undertaken, which will underpin the new LAP for Naas.</p> <p>Primarily, the connection will assist with the reduction of congestion and queuing traffic on the stretch of the R445 between the existing Lidl store and Jigginstown House and facilitate a link between the residential development emerging to the north of the Elsmore roundabout on the South Ring Road and the retail and employment uses at Naas Retail Park as well as the wider road network and the M7 to the west.</p> 	<p>It should be noted that the strategy does not specifically analyse the effects of rezoning agricultural lands that were not considered in the conceptual zoning map provided by KCC Planning Department for the purposes of this Transport Strategy. This means the inclusion of this link would be outside the scope of the strategy. If the rezoning is proposed in a revised draft of the LAP, then the strategic objectives would be revisited.</p>



Proposed Link Street Objective and Cyclist/Pedestrian Benefits

The proposed link street will also provide a new link for cyclists and pedestrians through the lands and enable the access and servicing of the lands, which are under partial ownership of Cairn Homes Properties Ltd. This will serve to 'unlock' these lands which are considered to be a logical sequential location to facilitate the growth of Naas and counterbalance the quantum of development in the north-east of the town.

This submission is accompanied by a Technical Note (Technical Note 190012-TN-006) prepared by DBFL Consulting Engineers which provides further assessment of the proposed connection and its benefits to the surrounding road network, including reducing pressure on existing transport infrastructure and improving road safety for all users.

As set out in the DBFL Technical Note (Appendix 1), the recommended Link Street will provide segregated cycle and pedestrian facilities in compliance with DMURS, which will mirror the high standard/quality of the Devoy Link street and create permeability/connectivity from John Devoy Road (which is close to Naas town centre) to Newhall Retail park and Lidl. This Link Street would provide the necessary pedestrian and cycle facilities, in the short-medium term, for the residents of this area who wish to travel safely to the Newhall Retail Park or Lidl Store on sustainable modes and provide a link/connection to the proposed Corbally Branch Greenway of the Grand Canal.

Strategic Benefits of Proposed Link Street Objective

Our client Cairn Homes Properties Ltd. has previously submitted a response to the Public Consultation Issues Paper for the Naas LAP 2019-2024 in May 2019 and the Draft LAP (withdrawn) having respect to the lands under their ownership at Jigginstown, Naas, Co. Kildare.

These lands are located to the south of the ring road and were zoned for '*I-Agriculture*' with an objective '*to retain and protect agricultural uses*' in the extant Naas Town Development Plan 2011-2017 (See figure 1 below). Our client also owns '*C-Residential*' zoned lands to the north of the ring road (c. 16 hectares) which link into the '*A-Town Centre*' zoned lands. The proposed inclusion of a new link street road objective between the R445 and R447 will assist in achieving the strategic aims of the draft Transport Strategy by: • *Addressing the current transport issues in Naas and Sallins* • Providing a link street that will ease congestion and vehicular queuing on the R445 Newbridge Road approaching the junction with the R447. • *Anticipating future problems* • Providing a link street that will help to avoid potential queuing on the R447 South Ring Road approaching the junction with the R445.

The point is noted.

The proposals will also enhance connectivity through the south part of Naas for cyclists and pedestrians by the implementation of a link which will help to prioritise sustainable modes of travel. This will improve access from the residential areas on the R447 South Ring Road and the retail warehousing, supermarkets and employment uses located at Newhall Retail Park and Naas Retail Park.

It will also provide for potential new routes for public transport links to a key distributor road in Naas and link the Existing Cycle Lane on the R447 South Ring Road with the planned Greenway along the R445 Newbridge Road as included in the draft Transport Strategy. The proposed link will also enhance the provision of cycling infrastructure in the southern part of Naas and complement the Draft Cycling Strategy Long Term Measure C22 to provide a Cycle Lane at Newbridge Road from Canal Crossing to South Ring Road.

Recommended Additional Public Transport Measures

Our client strongly supports the provision of additional public transport measures close to their development at Elsmore Phases 1 and 2. As set out in the DBFL Technical Note in Appendix 1, the existing bus stop on the Newbridge Road (R445) is some 500-800m from residential properties in Elsmore. Also, the existing East-West bus route, which links key trip attractors along the Newbridge and Dublin Road with the town centre, is not one of the preferred bus routes for the public transport network in the Draft Transport Strategy.

The matter of revision of bus existing bus services and the development of additional bus stops are best addressed to the NTA.



Elsmore and Oakpark will generate significant travel demands. As such we respectfully request that public transport routes and bus stops are provided within this area as part of the public transport objectives.

The proposed provision of public bus set down has been previously discussed with Kildare County Council & both public & private bus operators have previously expressed interest and canvassed for a set down on both sides of southern ring road close to Elsmore roundabout serving busses from Dublin southbound & busses from the south travelling northbound to Dublin and Sallins Train Station.

Such measures / objectives would provide sufficient sustainable travel modes within the developing community. A feeder bus service (or expansion of existing) between Elsmore/Oakpark area and Sallins Train Station would also be welcomed, providing a link to further sustainable modes.

From a wider strategic perspective, our client supports the provision of a Bus Priority/public transport street between the town centre and Sallins Train centre, which would benefit the whole town of Naas and improve public transport participation rates through the provision of a dedicated and direct route to Sallins Train Station.

Planning Policy Supporting Link Street Objective

There is a recognised need in the National Planning Frameworks (NPF) to align investment in infrastructure, with housing and employment in appropriately located settlements. It is considered that County Kildare, and in turn settlements such as Naas, identified as a 'Key town' located on the M7 Economic Corridor, is strategically located to assist in providing for future population and housing growth in a sustainable manner.

In this regard, the proposed new link between the R445 and R447 will assist in the access and servicing of the lands which it bisects and enable its activation for future residential development contributing to the sustainable and sequential growth of Naas in accordance with the objectives of the National Planning Framework, its Appendices and the zoning guidance as set out in the DoHPLG's Local Area Plan Guidance Manual.

The proposed link will assist in achieving the Regional Spatial and Economic Strategy Policy Objective 5.3 to plan and design future development in the Dublin Metropolitan Area *'in a manner that facilitates sustainable travel patterns with particular focus on increased the share of active modes (walking and cycling) and public transport use and creating a safe street environment for pedestrians and cyclists'* and to a broader extent, the content of the Greater Dublin Area Transport Strategy 2016-2035.

It will also assist in achieving the Regional Policy Objective 4.48 by improving the transport network within and serving Naas town including delivery of *'a robust and efficient walking, cycling and bus network'*, support the *'development of the Grand Canal for amenity, recreation and sustainable transport... linking to the Grand Canal Greenway'* as set out in RPO 4.49 and supporting an enhanced role for Naas as *'a hub for high employment, residential and amenities'* in accordance with RPO 4.53.

The inclusion of the link street objective is considered to have a positive impact on accessible and permeability in the southern part of Naas when assessed against the criteria in the draft Transport Strategy. It will also align with Road, Public Transport, Walking and Cycling Objectives in the draft document and assist with improved sustainable travel links in the area.

3.0 SUMMARY & RECOMMENDATIONS TO FINAL NAAS TRANSPORT STRATEGY

Recommended Link Street Objective



3.1 This submission highlights the transport benefits of the inclusion of a new link street objective withing the Naas/Sallins Transport Strategy linking the R447 South Link street to the R445 Newbridge Road.

3.2 The proposal has been assessed against the Multi Criteria Analysis methodology set out in the draft strategy and is considered to have 'Moderately Positive' cumulative impact to the transport provision in the area in comparison to other considered options.

3.3 It is considered that the inclusion of a link street will provide a strategic and deliverable link in the southern part of Naas as part of the sequential and sustainable development of Naas. It is recommended that the proposed link street should be an integral objective of the Transport Strategy and given full regard in the technical analysis being undertaken, which will underpin the new LAP for Naas.

Proposed Link street Objective and Cyclist/Pedestrian Benefits

3.4 The proposed link will also align with and contribute to Public Transport, Cycling and Walking Objectives as set out in the draft Transport Strategy. This includes the implementation of a high-quality route which will prioritise cycle and pedestrian links in accordance with DMURS.

3.5 This will enhance and provide continuity to the existing cycle lane on the South Ring Road and improve links to the Grand Canal Greenway. This will improve permeability for residents at the existing and future residential development at Jigginstown to the north and south of the Ring Road with the wider transport. Links to the retail and employment uses at the western end of Newbridge Road.

Recommended Additional Public Transport Measures

3.6 Our client strongly supports the provision of additional public transport measures close to their development at Elsmore Phases 1 and 2.

3.7 We respectfully request that public transport routes and bus stops are provided within this area as part of the public transport objectives.

3.8 The proposed provision of public bus set down has been previously discussed with Kildare County Council & both public & private bus operators have previously expressed interest and canvased for a set down on both sides of southern ring road close to Elsmore roundabout serving busses from Dublin southbound & busses from the south travelling northbound to Dublin and Sallins Train Station.

3.9 Such measures / objectives would provide sufficient sustainable travel modes within the developing community. A feeder bus service (or expansion of existing) between Elsmore/Oakpark area and Sallins Train Station would also be welcomed, providing a link to further sustainable modes.

3.10 From a wider strategic perspective, our client supports the route of the Bus Priority street between the town centre and Sallins Train centre, which would benefit the whole town of Naas and improve public transport participation rates through the provision of a dedicated and direct route to Sallins Train Station.

Planning Policy Supporting Link street Objective

3.11 It is considered that the proposed link street will assist in accessing and servicing the lands, making this viable for future development. This will facilitate the logical and sequential extension of the settlement in accordance the objectives of the



National Planning Framework, its Appendices and the zoning guidance as set out in the DoHPLG's Local Area Plan Guidance Manual

3.12 Our client Cairn Homes Properties Ltd. has previously submitted a response to the Public Consultation Issues Paper for the Naas LAP 2019-2024 in May 2019 having respect to the lands under their ownership at Jigginstown, Naas, Co. Kildare.

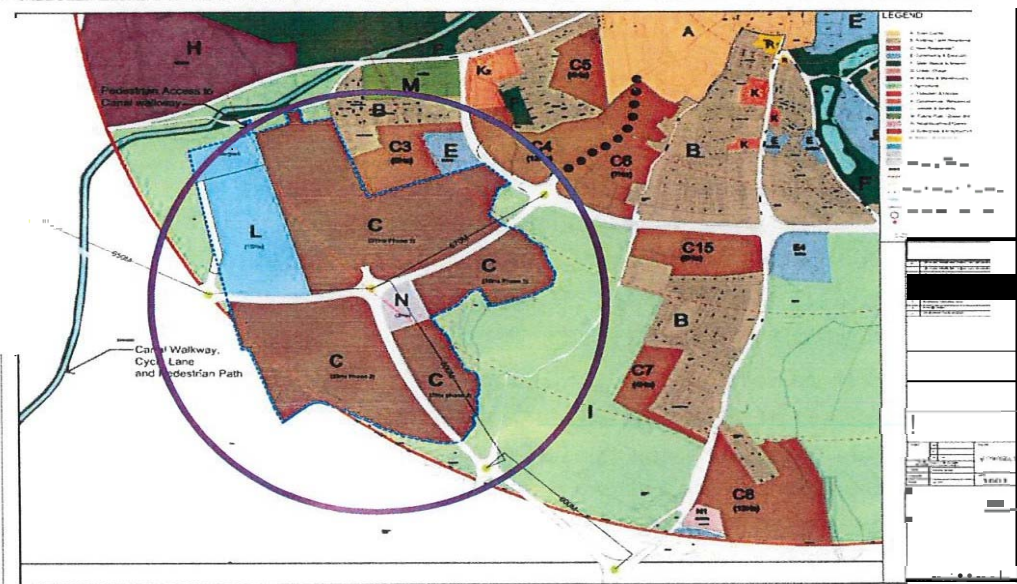
3.13 Cairn Homes Properties Ltd have a proven track record for acquiring and delivering high quality housing developments throughout the country which generally provide a diverse unit mix to cater for the wider population. Cairn Homes are on site in Naas and have recently completed a vital piece of infrastructure in the Devoy Link street which connects the subject land directly to the town centre.

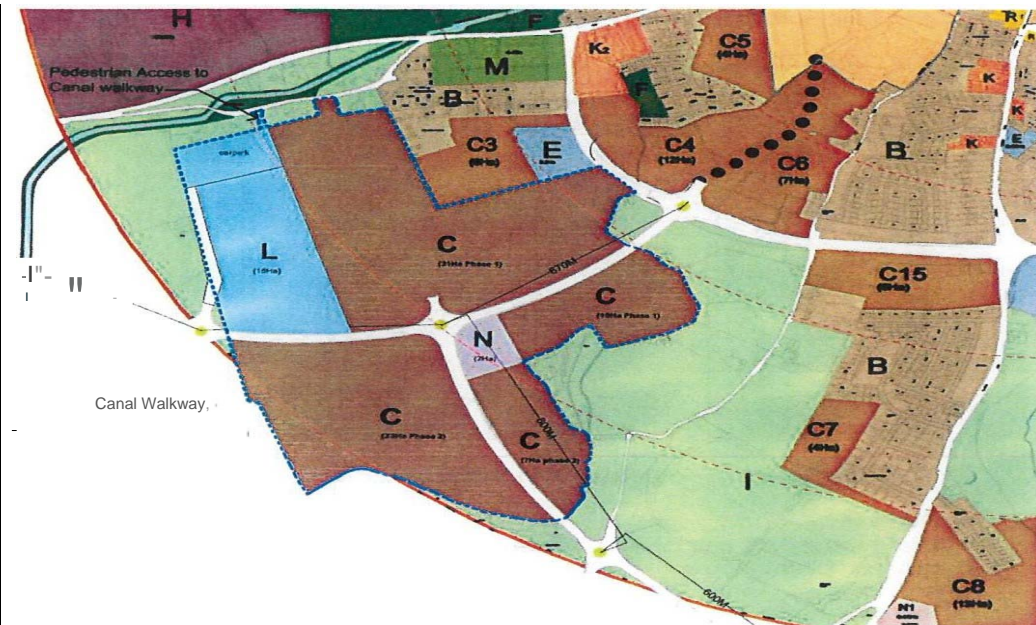
3.14 The inclusion of the link street objective will enhance permeability and connectivity in the southern part of Naas and address the deficit of 'Preferred Road Options' in the area as set out within the draft Transport Strategy.

3.15 It is respectfully requested that this submission be taken into consideration in the preparation of a final Transport Strategy for Naas/Sallins, and we look forward to the publication of this in due course.



7.23 Viztip Ltd. Submission & Response

Viztip Ltd. Submission (extracts of the report only)	KCC Response
<p>I refer to public advert inviting submissions and I enclose Transport Assessment Report dated Oct 2017 prepared by Roughan & O'Donovan which you may find of benefit in preparing your final report.</p> <p>In particular, I refer to page 20 of the report (copy enclosed) summarising the benefits of Jigginstown Link Roads for general traffic.</p> <p>1. SCOPE</p> <p>This report has been commissioned on behalf of Quinby Holdings Ltd. in relation to a proposed rezoning of lands from agricultural use for development at Jigginstown at the southern edge of Naas, County Kildare as shown in Figure 1.1 below. It provides a preliminary assessment of the transportation issues associated with potential development of the lands.</p>  <p>Figure 1.1: Location of Subject Lands outlined in purple ring (including some existing lands zoned for development in northeast area)</p> <p>The transport assessment considers the principles of accessibility of the lands proposed for zoning by each mode of transport and the likely scale of transport demand that will be generated. Provision of potential new access roads is addressed, and a high-level consideration given to the likely transportation impacts of the proposed zoning.</p> <p>1. PROPOSED ADDITIONAL ZONING</p> <p>The landowner at Jigginstown for whom this report has been prepared, is proposing the rezoning of 71 Ha (denoted C) and 17 Ha for associated local services and facilities as shown on the map below.</p>	<p>It should be noted that the strategy does not specifically analyse the effects of rezoning agricultural lands that were not considered in the conceptual zoning map provided by KCC Planning Department for the purposes of this Transport Strategy. This means the inclusion of this link would be outside the scope of the strategy. If the rezoning is proposed in a revised draft of the LAP, then the strategic objectives would be revisited.</p>



Proposed Rezoning of Lands at Jigginstown

These lands are classified as "outer suburban / green-field" in the current development for which the residential density guideline is 30 units per Ha, equating to potential for 2,130 houses accommodating between 4,260 and 5,325 people. A local, sports facilities and a neighbourhood centre would be provided on the lands denoted Land N.

The proposed additional zoning of these lands for residential development will provide necessary scope for planned and sustainable growth in the population of Naas in a location that is close to the town centre and a logical extension of the urban area in a compact fashion. It will avail of existing road infrastructure that is intended to support adjoining development and is currently under-utilised.

Provision for leisure and local retail and social services within the lands proposed for rezoning will enable self-sufficiency of the new residential community for many purposes, and this will minimise the generation of short distance local transport demands.

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Summary of Benefits of Jigginstown Link Roads for General Traffic

The proposed new link roads at Jigginstown will provide significant relief of traffic pressures at 3 key junctions on the existing main road network in Naas South as follows:

- i) 42% reduction in traffic demand at Junction 1, R445 Newbridge Road and Naas Southern Ring Road traffic signals;
- ii) 30% reduction in traffic through the R445 Newbridge Road Roundabout at Newhall Retail Park;
- iii) 12% reduction in traffic through the R448 Kilcullen Road Roundabout;

The above benefits are very considerable and demonstrate the valuable expansion of the road network that can be achieved through zoning and development of the lands at Jigginstown.



1. SUMMARY & CONCLUSIONS

a. Development of the lands at Jigginstown for housing and ancillary local services will provide an opportunity to deliver 3.5km of new link roads to greatly expand the road network in Naas South.

b. The proposed new link roads at Jigginstown will provide significant relief of traffic pressures at 3 key junctions on the existing main road network in Naas South as follows:

- 42% reduction in traffic demand at Junction 1, R445 Newbridge Road and Naas Southern Ring Road traffic signals;
- 30% reduction in traffic through the R445 Newbridge Road Roundabout at Newhall Retail Park - This will provide a solution to a problem that is not addressed in the M7 Improvement Scheme that is about to commence construction;
- 12% reduction in traffic through the R448 Kilcullen Road Roundabout;

c. The above benefits are very considerable and demonstrate the valuable expansion of the road network that can be achieved through zoning and development of the lands at Jigginstown.

d. The lands at Jigginstown are very conveniently located close to Naas town centre at a distance of between 1km and 2km from Murtagh's Corner at the southern end of Main Street. This will support a very high mode share by walking and cycling for short focal trips with very few car trips expected at peak hours in this direction.

e. Residential development of 2,130 dwellings may occur on the lands proposed for zoning.

f. A total number of 1,800 trips are expected in the AM peak hour from the residential development at Jigginstown. With a mode share by car of 48%, there will be 864 vehicles per hour generated for departure and arrival trips. 90% of the new car trips will head outward and away from the town.

g. The proposed new link roads at Jigginstown will enable newly generated traffic from the lands to avoid the existing busy main roads and junctions on the Naas Southern Ring Road and the R445 Newbridge Road as far as Newhall. Thus the new development will not erode the substantial benefits for the existing road system that will be provided by the new link roads.

This Transport Impact Assessment has demonstrated that there will be a significant net benefit for traffic conditions in Naas South derived from the delivery of 3.5km of new link roads through lands proposed for zoning at Jigginstown.



7.24 Elsmore Owners Management Co. Submission & Response

Elsmore Owners Management Co. Submission	KCC Response
<p>Submission No. 1</p> <p>Please see below copy of a letter which was submitted to Kildare CoCo last year.</p> <p>The residents of Elsmore and in particular the residents of "The Walk" are seriously impacted by the levels of noise coming from the South Ring Road. This is of such annoyance that some owners are genuinely considering leaving the estate.</p> <p>We would greatly appreciate if priority consideration could be given to resurfacing the ring road with a low noise asphalt at the earliest possible opportunity.</p> <p>Submission No. 2</p> <p>I am writing to you on behalf of Elsmore OMCLG, for whom Petra Management Ltd is managing agent. Elsmore is a new build housing development located at Naas West, Co. Kildare.</p> <p>At a recent AGM for the Owners Management Company, members raised an issue they have been facing of excessive noise levels caused by the Naas South Ring Road (R447).</p> <p>The road has been identified by Transport Infrastructure Ireland as a major road carrying over 3 million vehicle passages per year.</p> <p>Research carried out by property owners in the development has found that noise levels exceed World Health Organisation (WHO) levels, which states that anything above 53 decibels (db) Lden and 45 db Lnight contributes adversely to human health. Noise level thresholds for this particular road have been recorded by residents at 70 db (A) Lden, and 57 db (A) Lnight.</p> <p>Needless to say the noise is having a significant negative impact on the enjoyment and health of residents of The Walk, Elsmore. Noise continues throughout the day and night which is an extreme nuisance. Residents report their sleep is disturbed and it is not possible to enjoy peace in homes when windows are open.</p> <p>In light of the residents of Elsmore having reviewed the Kildare Third Draft Noise Action Plan, and given that houses have been built so close to this major road in Naas where noise levels are above WHO noise guidelines, Petra Management Limited on behalf of Elsmore Owners Management Company Limited by Guarantee, is requesting that action be taken to reduce the impact of road noise from South Ring Road near Elsmore, through resurfacing the road with a low noise road surface finish, and employing effective speed management.</p>	<p>Noted, however, please understand that this is outside the remit of the Naas / Sallins Transport Strategy</p> <p>As above.</p>



7.25 Maudlins House Hotel Submission & Response

Maudlins House Hotel Submission - Brock McClure	KCC Response
<p>Submission in respect of Lands at Naas Business Park Naas North, On behalf of Maudlins House Hotel</p> <p>1 Introduction Brock McClure Planning and Development Consultants have prepared this submission on behalf of Maudlins House Hotel, in respect of their landholding at Naas Business Park.</p> <p>This report sets out comments in respect of the Naas/ Sallins Transport Strategy as it relates to the subject site.</p> <p>Our client recognises the importance of the Transport Strategy and its relevance to stimulating employment, sustainable living options, alongside sustainable transport modes. Our client is concerned that the Strategy has failed to acknowledge the uses, activities and trip generation arising at Naas Business Park.</p> <p>As a result, the draft Strategy has little regard to creating sustainable transport alternatives for employees and patrons of uses within the Park. This has the ability to severely impact on the viability of the Business Park and will ensure the continued use of unsustainable transport options to the site.</p> <p>2 Site Context 2.1 Site Location</p> <p>Our client's site is outlined in red in the aerial photo below Aerial View of the Site at Subject Site</p>	<p>Incorrect. A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the Naas Business Campus.</p> <p>Incorrect. A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the Naas Business Campus.</p>



2.2 Site Context

At present the site accommodates, inter alia, 120 office workers, an average of 500 cinema patrons per night, and will have a 100 no bedroom hotel (Maudlin's House Hotel upgrades & extension works Register Reference 20/294). Additional bicycle parking and eCar charging points are proposed by way of this application. There are also approximately 450 car parking spaces across the Business Park.

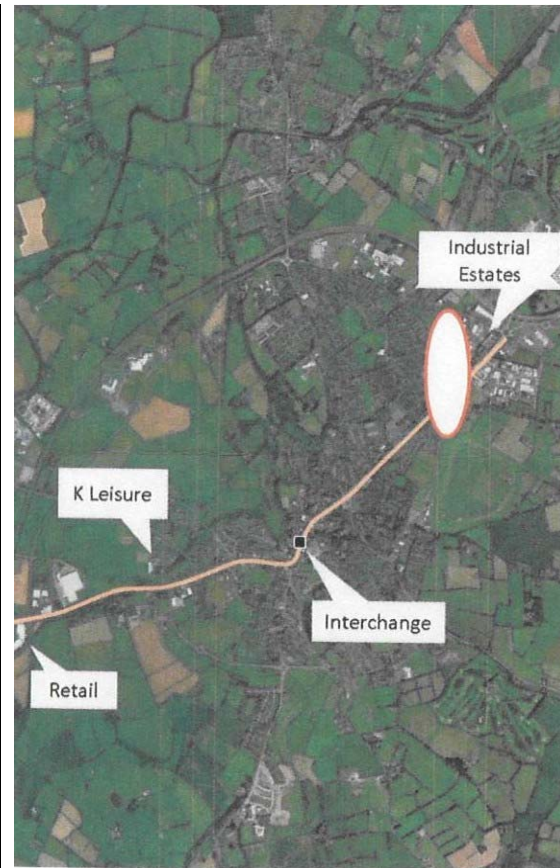
3 Study Relevance

We have reviewed the Draft Strategy and found very little evidence of either analysis or consideration of this area of the town in general.

Bus Route Option 4 was considered in the Strategy:

Bus Route Option 4: East-West Link The east-west link is intended to link key trip attractors along the Newbridge Road and Dublin Road with the town centre (Figure 8.15). Key destinations include; the Kildare County Council Offices, MERITS digital hub, K Leisure, Naas Further Education and Training Centre, Aldi and the town centre. This corridor is the main route for existing bus services through Naas and there would be a significant overlap in services.

Incorrect. A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the Naas Business Campus.



This route was discounted primarily due to an identified duplication of existing routes.

The east-west bus service would connect key trip attractors, but the duplication between this option and the existing bus routes along this corridor would significantly reduce the potential patronage. As a result, it is unlikely that this bus route would attract enough passengers to offset the cost of running the service. To a certain extent, this bus service would encourage people to transfer from cars to bus travel which would reduce collisions and emissions.

We welcome the acknowledgement that this route would connect key land uses, however, given that the uses in Naas Business Park do not appear to have been considered in any meaningful manner we question the conclusion that the bus route would not attract enough passengers.

- We ask that Bus Route Option 4 be reconsidered.

Aside from a proposed new cycling track from the site to the town centre, there are no proposed improved mobility measures which would suggest that the Council have considered the existing, unsustainable, modal split that exists at Naas Business Park.

Incorrect. A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the Naas Business Campus.

Incorrect. A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the Naas Business Campus.



Evidence suggests that most employees and patrons of the site travel by car and there is no obvious incentive to disrupt this pattern in the Draft Strategy. In fact, if Patrons want to avail of a bus service they need to walk as far as the roundabout at the Sallins Road.

In our view, this is a significant failure of the Strategy and we ask that it be revisited.

Furthermore, we would welcome all mobility options for the subject site and suggest that this should include:

- Increased cycle and pedestrian infrastructure in the vicinity of, and directly serving, the subject site;
- Pedestrian crossings in the vicinity of the subject site.
- We would also suggest that an additional park and ride facility could be accommodated at this location.

Our client has their own Mobility Strategy prepared for the Park and would be more than willing to share this with the Council is this would assist in furthering their analysis.

4 Conclusion

- Despite the quantum and mix of uses at this location the Transport Strategy fails to acknowledge the subject site in any meaningful capacity.
- This is a serious omission and one that undermines the credibility of the overall development strategy for Naas.
- Given the unsustainable travel patterns that occur at this location, our client is disappointed that the Strategy failed to provide any options in this regard.
- We ask that the matter is examined from first principles.

Incorrect. A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the Naas Business Campus.

Please refer to the Dublin Road Cycle Corridor Scheme

Please refer to the Dublin Road Cycle Corridor Scheme
Not appropriate at this location.

Noted.

Incorrect. A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the Naas Business Campus.

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7.26 Edelvale Property Ltd. Submission & Response

Edelvale Property Ltd. Submission - Brock McClure	KCC Response
<p>Submission In respect of Lands at Maudlins Interchange Naas North,</p> <p>1 Introduction</p> <p>This report sets out comments in respect of the Naas/ Sallins Transport Strategy as it relates to the subject site.</p> <p>Our client recognises the importance of the Transport Strategy and its relevance to stimulating employment, sustainable living options, alongside sustainable transport modes. Our client also recognises the important of this strategy to the ultimate success of the Maudlins Interchange location. Our key concern is this strategy completely misses the opportunity offered at this location, and furthermore, actively supports the status quo - which is an underused site at a strategic gateway to Naas town.</p> <p>2 Site Context</p> <p>This section of the report briefly details the site context, namely the Magna Donnelly Site, formerly Donnelly Mirrors Ltd., a set of mostly vacant industrial buildings at the south east of the Maudlins Interchange, Naas, Co. Kildare.</p> <p>2.1 Site Location</p> <p>Our client's site is outlined in red in the aerial photo below. Together with the owners of the Cemex site we are confident that our client can move forward with a coherent development strategy which would complement equally the individual land holdings. A supportive planning context is required to achieve this.</p>	<p>The sensitivity of Junction 9 to increased traffic generation in the immediate vicinity of the junction is recognised by the Roads and Transport Directorate. This has to be balanced by the need to develop the brownfield sites in the vicinity of this primary approach to the town. The ideal redevelopment would combine low trip generation of vehicular traffic with a series of quality developments. The Naas/Sallins Transport Strategy recognises the need to find the right balance in the above. Extensive traffic modelling of the impacts of future development at the sites in question was undertaken. See Appendix B.2 of the draft Strategy document.</p>



Aerial View of the Site at Subject Site with adjacent' site also highlighted

2.2 Site Context

The site is located to the southeast of the Maudlins Interchange adjacent to the M7 motorway. The site is part of a combination of industrial sites at this location. The site has pedestrian and vehicular links to the surrounding area and is approximately 2km from the Naas town centre.

The site is approximately 6.3 hectares in area and has direct access on to the M7 Motorway.

We wish to note that our client has, historically and continues to actively engage with the Council with the aim of realising the development potential of the site at this important gateway location to Naas Town.

Noted.

A submission was made on the Draft Naas LAP process, and meetings have been held with Council officials regarding progressing the development of same.

Noted.

A design team is engaged and we are at an advanced stage of preparing a Masterplan which it is intended to tie into a supportive Local Area Plan.

Noted.

3 Planning Context

For the purposes of all readers of this document, it is important to briefly highlight the planning context of the site, which, consistently, in these documents, development potential is conveyed on the subject site.

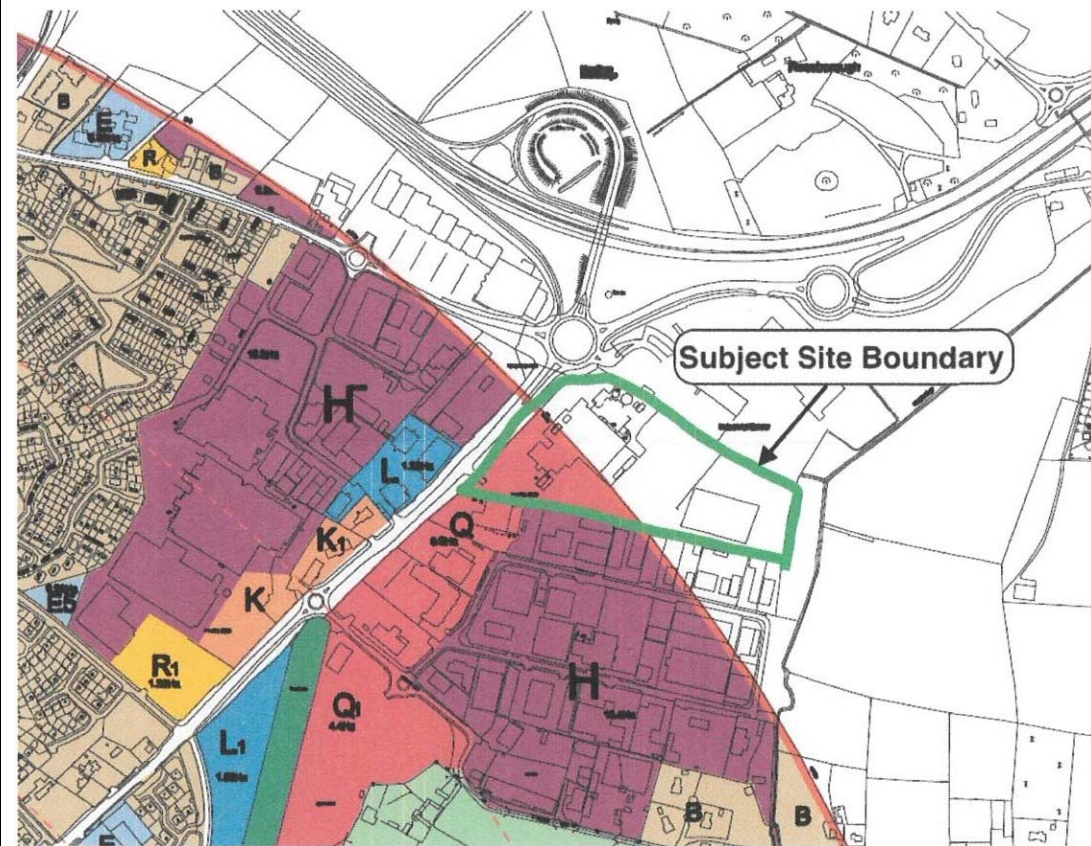
3.1 Naas Town Development Plan 2011-2017 (and Environs Plan)

The site zoning and any relevant policies and objectives pertaining to the site are set out below.



Under the Naas Town Development Plan, a section of the site is zoned for 'Q: *Enterprise & Employment*'. The objective of this zoning is "To *facilitate opportunities for employment and enterprise uses including manufacturing, research and development, light industry, employment and enterprise related uses within a high quality campus / park type development.*". The Naas Town Development Plan Map is shown below with the subject land boundary outlined in green.

Naas Town Development Plan 2011-2017 Zoning



Comment: The Draft Transport Strategy provides no solutions, options or proposal which would suggest it has taken account of the potential of the site to accommodate significant levels of enterprise, and a high quality campus, which the statutory zoning objective confers on the subject site.

It is our strenuous submission that the Strategy is completely deficient in respect of our client's site. At a more strategic level, this site is located at a Gateway to the town, and the lack of ambition and mobility options in the Draft Transport Strategy has the potential to curtail the development potential of this important site, with the threat of vacancy of the site a very real prospect in the long term.

3.2 Draft Naas Local Area Plan 2019-2023

The Draft Local Area Plan (LAP) 2019-2023 (withdrawn) provided some clarity on the intended zoning and other objectives in relation to the subject site.

Under the Draft Naas LAP 2019-2023, a section of the site is zoned for 'Q(1)2: *Enterprise & Employment*'. The objective of this zoning is "To *facilitate opportunities for employment and enterprise uses including manufacturing, research and development, light industry, employment and enterprise related uses within a high quality campus park type development.*"

The stated purpose of this zoning in the Draft LAP, Section 10.4 is:

Incorrect. Extensive traffic modelling of the impacts of future development at the sites in question was undertaken. See Appendix B.2 of the draft Strategy document.

Incorrect. Extensive traffic modelling of the impacts of future development at the sites in question was undertaken. See Appendix B.2 of the draft Strategy document.



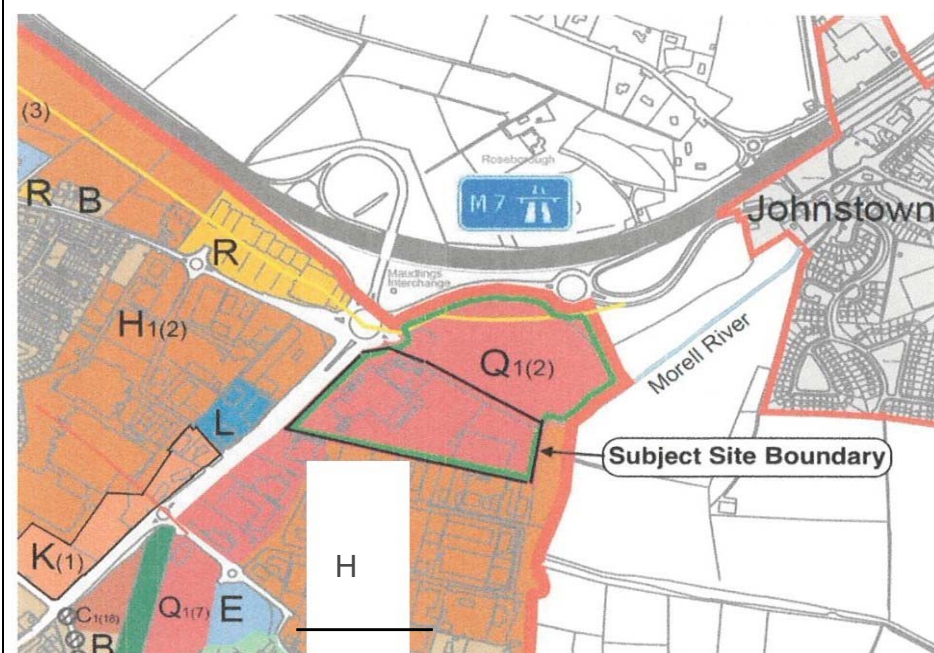
"..to provide for enterprise and employment uses in high quality well designed environments. Sites forming gateway entrances to Naas at the Maud/ins Interchange(Junction 9) and the Sallins Bypass (Junction 9a)/Northwest Quadrant shall be of a high-quality architectural design and incorporate detailed landscaping."

The site is therefore identified as suitable for a landmark building with a high quality design. The specific objective for the site states:

"Q1 (2) Dublin Road, former Cemex and Donnelly Mirrors sites: Any proposed development of these sites shall be of a high standard and quality having regard to their strategic location off the Maud/ins Interchange and as key gateway sites to the town from the M7. A comprehensive masterplan shall be prepared for the overall land parcel to ensure development does not take place in a piecemeal manner and integrates with existing development and infrastructure."

The Naas Draft LAP Map is shown below with the subject land boundary outlined in black.

Naas Local Area Plan Zoning- Pro 2019-2023



The lands are specifically identified on the zoning map as regeneration lands (green line) along with the adjoining Cemex site. Section 5.3.4 of the Draft LAP states the following:

"To the southeast of the Maud/ins Interchange, lands have been zoned for Enterprise and Employment (Q). These lands include the sites of the former Donnelly Mirrors facilities and the Cemex Concrete plant. These occupy prominent brownfield sites that have the potential to be prime locations for development with easy access to the motorway network and all necessary services. These lands have been designated as Regeneration Lands within the Plan (ref: Map 8.1). Any proposed development of these sites shall be of a high standard and quality having regard to their strategic location off the Maud/ins Interchange and as key gateway sites to the town from the M7."

Again, our client remains concerned that the Draft Transport Strategy has failed to have regard to the objectives that were clearly supported by the Council when drafting the intended development blueprint for the future of Naas, which included a requirement for a Masterplan. This is a clear acknowledgement of combined sites of significant development potential.

Incorrect. Extensive traffic modelling of the impacts of future development at the sites in question was undertaken. See Appendix B.2 of the draft Strategy document.



3.3 OPR Submission on the Draft Naas LAP

The OPR submission on the Draft LAP notes the new employment generating land use zonings that were proposed in this north west quadrant of Naas and the potential impact this would have on the road network and consequently on sustainable travel patterns, energy demands and climate change.

The implication by the OPR is that drawing car based trips to these lands from a wider area across Naas and effecting key strategic interchanges, has not been the subject of a transport strategy to inform the land use zonings proposed in the draft LAP.

The absence of an integrated transport and spatial planning policy is seen as a key deficiency of the Draft LAP and therefore it all the more concerning that our client's lands have not been considered.

3.4 Summary - Planning Context

The planning context to date suggest significant development potential on the site, a site that, in its current form, is widely recognised as being underused and an inappropriate entrance to the town.

4 Study Relevance

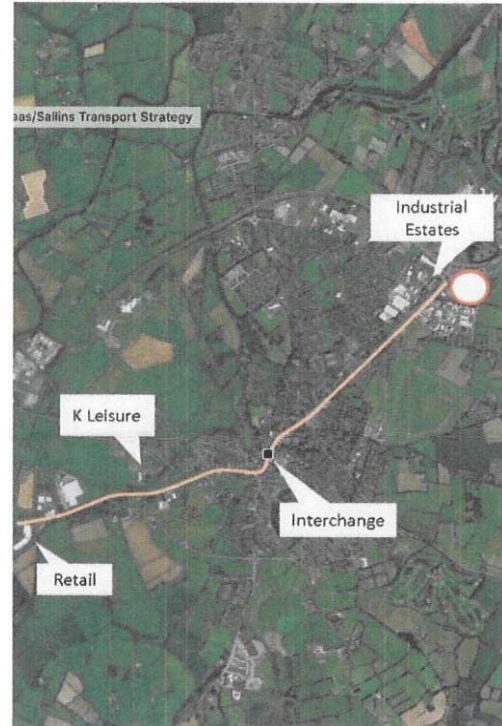
We have reviewed the Draft Strategy and found very little evidence of analysis or consideration of this area of the town in general.

Bus Route Option 4 was considered in the Strategy:

Bus Route Option 4: East-West Link The east-west link is intended to link key trip attractors along the Newbridge Road and Dublin Road with the town centre (Figure 8.15). Key destinations include; the Kildare County Council Offices, MERITS digital hub, K leisure, Naas Further Education and Training Centre, Aldi and the town centre. This corridor is the main route for existing bus services through Naas and there would be a significant overlap in services.

Incorrect. Extensive traffic modelling of the impacts of future development at the sites in question was undertaken. See Appendix B.2 of the draft Strategy document.

Incorrect. Extensive traffic modelling of the impacts of future development at the sites in question was undertaken. See Appendix B.2 of the draft Strategy document.



This route was discounted primarily due to an identified duplication of existing routes .

The east-west bus service would connect key trip attractors, but the duplication between this option and the existing bus routes along this corridor would significantly reduce the potential patronage. As a result, it is unlikely that this bus route would attract enough passengers to offset the cost of running the service. To a certain extent, this bus service would encourage people to transfer from cars to bus travel which would reduce collisions and emissions.

We welcome the acknowledgement that this route would connect key land uses, however, in the absence of any recognition of the development potential of our client's site we question the conclusion that the bus route would not attract enough passengers.

We ask that Bus Route Option 4 be reconsidered.

Aside from a proposed new cycling track from the site to the town centre, there are no proposed improved mobility measures which would suggest that the Council are actively or seriously considering this area of the town, an important gateway location into Naas, as one which has significant development potential.

Our clients are deeply concerned by this obvious omission and ask that that the Strategy be revisited.

Furthermore, we would welcome all mobility options for the subject site and suggest that this should include:

- Increase cycle and pedestrian infrastructure in the vicinity of, and directly serving, the subject site;

There are extensive existing bus services along this alignment

A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the lands in question.

KCC reject this statement.

The strategy promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the lands in question.



- Pedestrian crossings in the vicinity of the subject site;
- Inclusion of the gateway in a high frequency direct transport link to Sallins.

On a more general note, we would welcome clarification from the Council if the gateway to Naas is now being reimagined in the manner suggested by the Draft Transport Strategy, The focus appears to have shifted to the north west of the town with scant attention given to the current entrance. A policy move such as this would have significant implications for the north east of the town.

5 Conclusion

- Despite the provisions of the existing statutory planning context, and the planning context suggested in the Draft LAP, the Transport Strategy fails to acknowledge the subject site in any meaningful capacity.
- This is a serious omission and one that undermines the credibility of the overall development strategy for Naas.
- Given their ongoing engagement with the Council in respect of this site, our client is genuinely surprised that the Strategy failed to have regard to the Maudlins Interchange area.
- We ask that the matter is examined from first principles and sustainable transport options in relation to Maudlins Interchange are considered.

The strategy promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the lands in question.

A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout.

Please liaise with the Planning Section in this regard.

Incorrect. Extensive traffic modelling of the impacts of future development at the sites in question was undertaken. See Appendix B.2 of the draft Strategy document.

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A new local bus services (Bus Route Option 3 - Eastern Spine) is proposed 270m south of the Dublin Road / Fishery Lane Roundabout. The Dublin Road is also well served by existing bus routes with a stop adjacent to the Odeon Cinema. The strategy also promotes the delivery of the Dublin Road Corridor Cycle Scheme which would enhance cycle network provision in the vicinity of the lands in question.



7.27 Westar Group Submission & Response

Westar Group Submission	KCC Response
<p>This submission is made on behalf of the Westar Group.</p> <p>The Westar Group are the owners of a significant landholding in Naas, in the area known as the northwest quadrant. These lands form a key strategic landholding close to the centre of Naas and can provide a potential link from Naas Main Street toward the nearby town of Sallins and its railway station. As such, these lands form an important element in the development of the Naas/Sallins Transport Strategy.</p> <p>We note the objectives of the Transport Strategy, namely; To promote sustainable development in Naas/Sallins To connect communities. To support the economic employment base. To enhance Naas as a cultural centre with a strong sense of place.</p> <p>It is important to say at the outset that the Westar Group are supportive of this Transport Strategy, and we recognise the need for a more sustainable transport approach in the area; to affect a modal shift away from car travel and promote walking, cycling and public transport routes.</p> <p>Three key elements of the Draft Transport Strategy will have the most significant impact on the development of Westar Group's lands. We take this opportunity to provide a brief comment on each and seek some further detail as follows:</p> <p>a Proposed Harbour Interchange Westar Group are supportive in principle of the provision of a bus interchange at this location and believe that an area capable of accommodating 4/5 bus stands for passengers to board/alight buses can be accommodated. We would like to highlight the need for the bus interchange to be of a size and form that will be sympathetic to the specifics of the harbour area.</p> <p>b Proposed Western Spine Route Westar Group are supportive of the principle of Western Spine route proposed. We would however seek clarification on whether the full length of this route is required to be 'bus only' or specific sections of the route only and would welcome the opportunity to discuss further.</p> <p>We would suggest that with the level of traffic generated by any proposed development and the provision of bus priority measures at junctions and bus stop laybys, a single route can be provided to accommodate both public transport and normal traffic in and around the harbour area.</p> <p>We note also that this route is identified in the Draft Strategy as a long term objective partly due to financial constraints and would suggest that if this section of the route was shared by both buses and cars, then it would be a better use of infrastructure and the cost savings achieved might allow it to be implemented at an earlier stage.</p>	<p>Thank you for your comments, details of the design will be considered at a later stage. The purpose of this strategy is to identify potential projects that will benefit Naas and Sallins from a transport perspective.</p> <p>Please refer to the Explanatory Note in Section 4 of this Submissions Report.</p> <p>Noted, please refer to Explanatory Note in Section 4 of this Report. In addition, please refer to Section 9.4 of the Transport Strategy which evaluates this link with private traffic and explains why it was discounted as a roads objective but kept as a public transport route.</p> <p>As above.</p>



Proposed Canal Bridges

Westar Group are supportive of proposals to increase the number of access points across the Grand Canal, east-west and north-south. The benefits of wider pedestrian and cycle permeability and linkages across the Canal are undoubted.

Vehicular access proposed as the 'Millbridge Street Link' too would be of benefit in removing vehicular traffic from Naas Main Street. We note the particulars of the harbour area (incl. ground levels and available space) which may create difficulties for the proposed public transport bridge toward the Newbridge Road.

We would respectfully suggest that pedestrian linkages across the Canal be prioritised in the Transport Strategy.

We would highlight also the likely requirement for Government funding towards such infrastructural projects (e.g. under EU Greenway Projects or Climate Action Fund etc.)

In summary, Westar Group wish to offer our support for the Transport strategy being prepared by Kildare County Council, and the move towards more sustainable transport options in the area.

We would welcome the opportunity to discuss in more detail with Kildare County Council some elements of the Strategy as outline above and look forward to engaging further with all relevant stakeholders in order to deliver benefits to the communities of Naas and Sallins.

Noted.

Noted.

Noted.

Thank you for your comments. Please refer to the Explanatory Note in Section 4 in relation to specific projects. KCC will be happy to engage with you in relation to the projects you have mentioned when they reach design stage.



7.28 Maynooth Cycling Campaign Submission & Response

Maynooth Cycling Campaign Submission	KCC Response
<p>1. The publication of the Naas/Sallins Transport Strategy is welcome but regrettably its vision and ambition is limited, even more so now with the priority given to active travel in the draft Programme for Government.</p> <p>2. The biggest disappointment of the draft Strategy is its failure to reference the 2009 National Cycling Policy Framework and its two targets of 10% cycling by 2020 and 10% of all journeys by bike by 2020. Kildare County Council has made no progress on these targets in the last 10 years and the strategy fails to put forward an estimate of when 10% will be achieved.</p> <p>3. The strategy fails to estimate the impact of the proposed measures if implemented now or if they are brought in over the timescale estimated ie short/long term. The strategy should futureproof the proposals to 2030 and 2040 as would be done in the case of a proposed road.</p> <p>4. The call for stakeholders to be consulted in relation to proposed permeability changes is welcomed but similar consultation should apply to key stakeholders in relation to all proposals.</p> <p>5. In section 10.2 Cycling Measures the strategic objectives include <i>Engage with schools with the aim of increasing cycling mode share</i>. Engagement with schools is a bland unquantifiable term. The new Programme for Government highlights travel to school and the need on health and environment reasons for car journeys to school to be replaced by journeys by active travel. While the strategy does quantify the number of residences within set distances of schools, there is no estimate of the potential level of modal switch.</p> <p>6. The number of proposed cycle trips are quantified in terms of high/medium/low potential but they should be defined in terms of percentage or range.</p> <p>7. Several of the roads identified as possible Shared Streets – in particular Sallins Road Naas has traffic levels multiple times higher than the threshold specified in the National Cycle Manual and in excess of best practice internationally. There appears to be no comments on the need to reduce/restrict traffic or how this would be achieved.</p>	<p>Reference to the National Cycling Policy Framework has been added to the strategy. It should be noted however that committing to a timeframe for achieving cycling targets is beyond the remit of this transport strategy. The objective of the strategy is rather to identify beneficial cycling infrastructure projects and to identify a likely timeframe for delivery. Cycling mode share is a complex variable, dependent on many factors outside the control of KCC. For example, the provision of more effective public transport which will remove cars from the road network and thus encourage active transport modes such as cycling.</p> <p>As above, this analysis is outside the scope of the transport strategy.</p> <p>Noted.</p> <p>Please refer to previous comment in relation to quantifying modal shift.</p> <p>We don't believe it would be possible to estimate these kind of numbers with any level of accuracy at this stage.</p> <p>Please refer to explanatory note in Section 4. In addition, specifically for Sallins Road Naas, the opening of the Sallins Bypass will reduce traffic on this road and increase its potential to be a shared space which is conducive to active transport modes.</p>



<p>8. A glaring omission is the failure to provide for cyclists beyond the B&Q roundabout. There are a significant number of potential cyclists travelling to and from Toghers and Newbridge but there is no provision for them in what is an extremely dangerous location for vulnerable road users. Access to Naas Town is should provide to safe routes for vulnerable road users as well as people in vehicles.</p>	<p>This is outside the study area of the Transport Strategy.</p>
<p>9. Another serious omission is at the first section of the New Caragh Road where there is space to prioritise vehicles with the addition in recent years of a left turning lane but no room for cycle facilities for secondary school children who will want to use the South Ring to return home.</p>	<p>There is insufficient space here to provide cycling facilities.</p>
<p>10. On the Newbridge Road, there is no provision for cyclists to turn right at the Pacelli Road where they may have to cross three lanes of traffic. In contrast, at the New Caragh Road, traffic lights are provided to assist people in vehicles to manoeuvre across one lane of traffic.</p>	<p>This is a matter for detailed design of future cycling infrastructure on this road.</p>
<p>11. It is unclear what if anything is proposed at the section of the Millennium Link Road where it crosses the canal and where the route for cyclists is changed from off-road to on-road.</p>	<p>Refer to explanatory note in Section 4 of this Report.</p>
<p>12. Provision of cycling facilities on key traffic routes such as the Newbridge Road between the town centre and the Millennium Link Road should be a short term priority.</p>	<p>Time scales for specific objectives have been chosen to be as realistic as possible, given the scale and resources required for a particular scheme.</p>
<p>13. The strategy fails to address induced demand due to the construction of additional roads which encourages traffic growth.</p>	<p>The new roads which were brought forward as part of this transport strategy were chosen based on their ability to reduce traffic on the main roads into and around Naas. As such, as most of the cycling proposals are also on these roads into the town, this is not considered to be an issue.</p>
<p>14. In relation to cycle parking, the strategy fails to point out that the Council has to balance the revenue from vehicle parking with the need for more bicycle parking and if it wants to enable more people cycling more often, it must accept that the loss of parking revenue to the Council will be more than offset that the benefits to society from increased cycling.</p>	<p>Noted.</p>
<p>The Road Objectives include Reduce unnecessary vehicular trips through Naas town centre. Reduce vehicular emissions in town centre by promoting mode transfer to sustainable travel modes. Objective 1 should be to prevent and not reduce unnecessary vehicular trips through Naas town centre. Objective 3 should be to minimise vehicular emissions rather than merely reduce them.</p>	<p>Although desirable objectives, it is not possible to commit to preventing unnecessary vehicular trips through the town or minimise vehicular emissions. The transport strategy cannot solve all problems but it does strive to improve the current situation towards a more sustainable future. Ultimately, many factors will influence emissions and vehicular traffic, many of which are outside the remit of KCC.</p>
<p>16. The multi criteria analysis lists a number of factors: • Economy Integration: there does not appear to be any mention of the health benefits of active travel or the cost to society of increased vehicular journeys. • Safety: it is widely accepted that An Garda Siochana records under-estimate the number of accidents to cyclists. • Environment: the report fails to recognise the effects of air pollution and the impact of poor air quality on people who are affected by Covid-19. • Physical Activity - there is no WHO HEAT Analysis of the financial benefits of active travel.</p>	<p>More detailed analysis is part of the detailed design phase of projects. Please note that the purpose of this transport strategy is to broadly identify the most beneficial projects for Naas and Sallins. Individual projects will undergo a more detailed options analysis.</p>
<p>17. Traffic management is still about maximising the number of vehicles through junctions with a 1970s philosophy of “Predict and provide” rather than focusing on the number of people.</p>	<p>Roads objectives brought forward as part of this transport strategy were chosen based on their ability to remove traffic from the main arteries into and around Naas.</p>



7.29 Sallins Road Safety Group Submission & Response

Sallins Road Safety Group Submission	KCC Response
<p>In order to address the safety of public transport users on Sallins main thoroughfare Kildare County Council must implement traffic calming measures on completion of the Sallins bypass given that the volume of traffic passing through the village will reduce and in turn the speed of vehicles will increase therefore increasing the risk of further fatalities or near fatalities. Sallins Road Safety Action Group have identified and presented 5 danger spots to Kildare County Council that requires immediate attention in order to address the safety of public transport users.</p> <p>In order to address the safety of PERMEABILITY (WALKING) on Sallins main thoroughfare Kildare County Council must implement traffic calming measures on completion of the Sallins bypass given that the volume of traffic passing through the village will reduce and in turn the speed of vehicles will increase therefore increasing the risk of further fatalities or near fatalities. Sallins Road Safety Action Group have identified and presented 5 danger spots to Kildare County Council that requires immediate attention in order to address the safety of PERMEABILITY (WALKING).</p> <p>In order to address the safety of CYCLING on Sallins main thoroughfare Kildare County Council must implement traffic calming measures on completion of the Sallins bypass given that the volume of traffic passing through the village will reduce and in turn the speed of vehicles will increase therefore increasing the risk of further fatalities or near fatalities. Sallins Road Safety Action Group have identified and presented 5 danger spots to Kildare County Council that requires immediate attention in order to address the safety of CYCLING.</p> <p>In order to address the safety of ROADS on Sallins main thoroughfare Kildare County Council must implement traffic calming measures on completion of the Sallins bypass given that the volume of traffic passing through the village will reduce and in turn the speed of vehicles will increase therefore increasing the risk of further fatalities or near fatalities. Sallins Road Safety Action Group have identified and presented 5 danger spots to Kildare County Council that requires immediate attention in order to address the safety of ROADS.</p> <p>In order to address the safety of CAR PARKING on Sallins main thoroughfare Kildare County Council must implement traffic calming measures on completion of the Sallins bypass given that the volume of traffic passing through the village will reduce and in turn the speed of vehicles will increase therefore increasing the risk of further fatalities or near fatalities. Sallins Road Safety Action Group have identified and presented 5 danger spots to Kildare County Council that requires immediate attention in order to address the safety of CAR PARKING.</p>	<p>Thank you for your comments. Please note that we are currently developing a Public Realm strategy for Sallins as part of this transport strategy. This was not complete at the time of the consultation. This Public Realm strategy includes traffic calming measures for Sallins and will be available as part of the final Naas / Sallins Transport Strategy document.</p>



7.30 Naas Access Group Submission & Response

Naas Access Group Submission	KCC Response
<p><u>WHO WE ARE:</u> We are a network of individuals and organisations working towards making County Kildare inclusive and fully accessible to all. As a group we support the removal of physical, attitudinal & communication barriers for all.</p> <p>This is done by: working closely as stakeholders with Kildare County Council. We regularly participate in street audits to monitor the ongoing development and improvement of the town's infrastructure. We also work with local businesses and disability organisations (such as IWA, KARE, NCBI) in identifying priority accessibility issues locally. We also regularly attend D.F.I, Irish Rail & Bus Eireann Disability User Group meetings in Dublin</p> <p>We welcome this draft document. However, we would like to see the inclusion of universal design and accessibility to be taken into more consideration. Accessibility is much more than physical access to buildings. It is also about providing inclusive access to services, accessible workplaces and access to information.</p> <p>Currently 13% of the population of Kildare or 27,768 people have at least one disability. Their age profile is: 45-64 is 8008 65+ is 7847. 16% of people who have a disability did not access to a car or van, compared to 7% of the general population. (Census 2016, www.cso.ie). We trust that you will listen and include our observations.</p> <p>Observations and comments and notes on the Naas/Sallins transport strategy draft report.</p> <p><u>SECTION 2 TRANSPORT AND DEVELOPMENT CONTEXT PREFERRED FRAMEWORK PLAN IN THE 2020 VISION FOR NAAS</u> 2.1.3.4 page 23 Walking and Cycling networks</p> <p>1 Introduce a car-free zone along the canal from Naas Harbour to Digby Bridge except for local access.</p> <p>2 We as a group support and welcome additional cycle lanes. By creating separate walking and cycle lanes, elderly and disabled people will feel safer walking on the footpaths without the fears of been struck by cyclist. Presently a large number of cyclist use the footpaths, many say they feel safer doing so.</p> <p>3 There is no fully accessible footpath in Basin St. An ESB pole is currently located at the entrance of Basin St. This needs to be removed and a secure, safe path needs to be installed along the side of KALU shop.</p> <p>Public transport</p> <p>1 There is a quote "encourage bus usage and reliability" but nothing about accessible buses. Presently, a wheelchair user cannot access or egress most buses in the County.</p> <p>2 Also, bus stops like Popular Sq. Naas where there is no shelter, path or timetable. An elderly person or wheelchair user cannot access or egress a bus because <i>even</i> if a bus is accessible there is no path for the bus ramp to rest on for the wheelchair to gain access or leave the bus.</p> <p>3 Presently there is currently only 1 wheelchair accessible taxi operation in Naas/ Sallins. This only operates during daytime hours 5 days a week. Recently, a wheelchair user in our Access Group had to procure a wheelchair accessible vehicle from Rathvilly, Carlow for a Saturday night event.</p>	<p>Please refer to Section 10 which describes proposed Greenway Projects. Noted</p> <p>Please refer to the Explanatory Note in Section 4 of this document.</p> <p>This is outside the remit of this transport strategy.</p> <p>Please refer to Part 8 plans for Poplar Square. In addition, note that the transport strategy includes an objective to upgrade bus shelters.</p> <p>This is outside the remit of this transport strategy.</p>



2.3.4

page 31

Public transport network

1 The no. 126 route has many VOL/double decker buses on this route. The Naas Access and Disability group have recorded over 10 VDL individual buses used on this route. A wheelchair user has no way of knowing which type of bus is coming along. Whether they can access the next bus is always a worry. The same applies on their return journey.

2 The existing timetables of 126 bus routes, has a wheelchair accessible symbol on all its timetables on bus shelters in Naas. This is incorrect as many of its buses are non-accessible as they are VOL'S.

3 "The dedicated Irish Rail feeder bus service to Sallins station" is not accessible. If a wheelchair user wishes to use the train, they have to find another way to get to their station as the feeder bus is not accessible.

4 On page 32 the following statement is incorrect" In general, orbital bus routes are accessible to residents living along the central spine of the town"

Most of the buses travelling through Naas/ Sallins are not accessible.

SECTION 3 CONSULTATION AND STAKEHOLDERS_

3.1.2

page 38/39

1 Note ...no reference to making the transport accessible, it refers to improving bus connectivity, but this is not any use if a person is not able to access a bus safely in the first place.

2 No mention of HGV ban in Sallins. The town will soon have a bypass and Sallins should be included in the document for a ban for non-essential HGV 's.

SECTION 4 Strengths, Weaknesses, Opportunities and Threats, (SWOT).

page 43

Table 4.1

Analysis of Naas and Sallins

There is a lot of weaknesses not included in this chart. No reference to...

1 The existing un-accessible transport systems in operation presently.

2 The lack of new bus stops to accommodate all the new housing estates around the town. There is a bus stop beside Sheehy Motors going towards Naas. The next bus stop is at the Fire Station in Naas town. This is a considerable distance for an elderly or disabled person to walk too. There is a busy retail park with Lid! supermarket at the Bundle of Sticks round about. It is not fair to ask somebody to carry their heavy shopping between these 2 bus stops.

3 Again, no mention of the existing, un-accessible bus stops like Popular Square.

4 There should also be a note of making the canal a car free zone.

SECTION 5 STRATEGY OBJECTIVES .

page 44

5.2.1

1 No 2. Should include accessibility with effectiveness frequency etc.

5.2.4

1 Should also include Sallins when referring to unnecessary vehicular trips in no .land no. 5 questions.

Noted.

This is outside the power of KCC to address. Please contact the bus service providers directly in relation to this.

This is outside the power of KCC to address. Please contact the bus service providers directly in relation to this.

Accessible was meant in a different context in this line.

Please see previous response.

This may be considered when the Sallins by-pass is complete and operational.

Please see previous response.

Please see previous responses.

Please see previous responses.

Please refer to previous response in relation to improving accessibility of public transport.

This has been amended in the text of the transport strategy.



SECTION 8 PUBLIC TRANSPORT MEASURES

8.14.2 Overview

page 52

- 1 Include accessibility in no.4. Public bus stop like Popular Square is not accessible and needs a shelter, timetable. An accessible path is also required for everybody, including elderly and disabled people to gain access safely any bus.
- 2 Include accessibility in reference to feeder bus to train station in Sallins. Note also, there is no accessible timetable available on display outside the Station. It is very difficult to find any timetable for the feeder bus currently operating.
- 3 Interchange should not be on Market Square. This area was historically the town square and the current Taxi rank should be removed to make it a pedestrian area. Popular Square and Market Square should be a seated area where the public can sit and enjoy ambience of the town.
- 4 There are currently 9 taxi places along Market Square. These should be moved to the rear of the Town Hall/ new Library.
- 5 The existing Disabled bay can be relocated across the road, making it 1 long disabled bay, suitable for small minibuses or large accessible vehicles to safely use a rear-ramp access system.

8.6.3

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We agree for the lobbying of the extension of the Dart line with electric Quad Track to Naas/ Sallins rail station.

SECTION 9 ROAD TRANSPORT MEASURES

Option 8

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- 1 The installation of traffic signals. A Zebra /Pelican crossing is required at St. David's R.C. Church, Sallins Rd. there is currently approx. 1000 students attending St. Marys secondary school. 800 attending the National school. 55 residents living in Mc Auley Place. Various events, meeting and classes use the Community Centre as well as customers using the Tea Rooms at Mc Auley Place. Finally, St. David's Church is a busy central religious Church. With all these people movements it is imperative that a safe crossing be installed outside Mc Auley Place.
- 2 The installation of traffic signals outside Naas General Hospital is also vital. This is a busy hospital and a Zebra/Pelican crossing is badly need for public safety there.
- 3 The installation of traffic signals on Newbridge Rd. outside LIDI roundabout. KCC has installed a safe, accessible path from Naas town to this roundabout. However, there is no way anybody can cross this busy road to Newhall Retail Park. This is a busy retail shopping centre with B&Q, Harvey Norman and other large retail stores in this shopping outlet.

9.8 PARKING OPTIONS ASSESSMENT

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- We wish that the disabled parking bay outside Mc Auley Place on the Sallins Rd. be retained.
- We refer again to the relocation of disabled parking bays outside Bank Of Ireland, Main St, be re-located to a nearby location, eg. Across the road outside Kavanagh's Bar.

POPLAR SQUARE

Naas Access and Disability Group have been conduction street audits on Poplar Square this last 6 years. No improvements have been made to the Square during this time.

Please see previous responses.

Noted.

Please note that the transport strategy proposes to move the bus interchange to the Harbour area in the future

Please refer to the Explanatory Note in Section 4 of this document. In the draft Public Realm section for Market Square (included in the final report), there is provision for a number of disabled bays. The location of these can be addressed as part of the detailed design.

New pedestrian crossings are a matter for the Naas area office.

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Please refer to the Explanatory Note in Section 4 of this document. As noted previously, in the draft Public Realm section for Market Square (included in the final report), there is provision for a number of disabled bays. The location of these can be addressed as part of the detailed design.

Please refer to Part 8 plans for Poplar Square.



- A wheelchair user cannot safely leave the footpath coming from South Main Street direction. In order to safely leave the footpath outside Hayden's Bar. A person has to go up Friary Rd. Then cross the road at the Old Tax office building to go to the other side. As they pass by Lawlors Hotel, the gaps on the paving are so wide that the wheels of the wheelchairs constantly gets caught and the wheelchair user needs assistance to carry on their journey. Finally, there is a step on the centre of the path at Butt Mullins restaurant which the wheelchair user has to navigate to carry on their journey.
- The black stone surface used on Popular Square is extremely slippery when it gets damp or wet. It is a danger to the public, especially elderly people.
- There is no bus-stop pole with timetable display in Popular Square. There is no bus shelter.
- There is no designated path for people to access or egress the bus.
- young people, elderly or disabled people are very vulnerable catching or leaving a bus here with on-street parking so close.
- There is no way a wheelchair user can catch or leave a bus because there is no path for the wheelchair ramp to rest on.
- This is the bus stop where elderly residents of Mc Auley Place disembark. But as there is no step or safe bus stop structure in Popular Square, many are afraid to use this stop. They have instead had to use alternative bus stops further up the street.

SECTION 10 _ NON-MOTORISED MEASURES

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Note. In referring to "three quarters of all homes in Naas and Sallins have access to bus services, which is a substantial improvement on the baseline situation. This statement is incorrect.

Wheelchair users do not have access to most bus services.

10.1.3.7

No reference to Zebra/ Pelican crossing at Naas General Hospital

SECTION 12 NAAS/SALLINS TRANSPORT STRATEGY

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12.5 Parking Strategy List of parking measures In reference to the relocation of perpendicular parking on Main St Naas, where do they plan the relocation of the 2 current disabled parking bays?

3 The substitution of 1 extended disabled parallel parking bay. These are for extra- long vehicles used by wheelchair users so they can place ramps at the rear of their vehicle.

ADDITIONAL NOTES

A paragraph needs to be included, advocating that walkers and cyclists need to be accommodated safely from the under construction Sallins By-Pass to the Millennium Park road. Presently looking at the new junction 9a which looks complete there seems to be little or no accommodation for cyclists or pedestrians there and this needs to be addressed.

Brief synopses of comments, suggestions and solutions.

- Popular Square, needs a constructed bus shelter, timetable and a designated path where wheelchair users and the elderly can access buses safely.
- Also, the completion of a safe, new accessible path outside Haydens Bar in Naas.
- The Rail feeder bus needs to be an accessible bus.
- All GoAhead buses need to be wheelchair accessible.
- Pedestrian lights/ Pelican lights outside, Naas Hospital, Mc Auley Place and LIDL roundabout, Newbridge Rd, Naas.

The text refers to "homes" rather than individuals, meaning that three quarters of houses are in the vicinity of bus stops. While KCC support accessibility, this statement is not in the same context as a discussion about accessibility for wheelchair users.

Please see previous response.

As noted previously, in the draft Public Realm section for Market Square (included in the final report), there is provision for a number of disabled bays. The location of these can be addressed as part of the detailed design. Please see previous response.

The design of Junction 9a is subject to planning conditions from An Bord Pleanala



- New bus stops needed, especially on the Newbridge/ Naas road and around new housing estates.
- The promotion of accessible taxi's in Sallins and Naas.
- HGV ban in Naas and Sallins. The town will soon have a bypass and Sallins should be included in the document for a ban for non-essential HGV 's.
- The lobbying of the extension of the Dart line with electric Quad Track to Naas/ Sallins rail station.
- Introduce a car-free zone along the canal from Naas Harbour to Digby Bridge except for local access.
- Include a paragraph advocating that walkers and cyclists need to be accommodated safely from the under construction Sallins By-Pass to the Millennium Park road.
- Presently looking at the new junction 9a which looks complete there seems to be little or no accommodation for cyclists or pedestrians there and this needs to be addressed.



7.31 Naas Community Mens Shed Submission & Response

Naas Community Mens Shed Submission	KCC Response
<p>NCMS members consider the Naas/Sallins Transport strategy a positive and vital undertaking for the wellbeing of the society of Naas and Sallins. The provision of walkways and cycling routes will be of huge benefit to the local population.</p> <p>The proposed town centre one way traffic system is considered a vital part of the strategy and will regenerate Naas as a popular shopping experience achieved in conjunction with the other elements of the strategy.</p> <p>Naas Community Mens Shed has submitted a case to Kildare County Council for the provision of a location on the green field site between Millbrook and the grand canal in conjunction with the Naas Tidy Towns committee which included a sketch of the site with our required facilities. We request that this is favourably considered in the strategy.</p>	<p>Please note that the option of making Naas town centre a one-way street was not progressed to the final strategy as other options were considered to be more beneficial in the multi-criteria analysis. Please refer to Section 12 for a description of all options brought forward to the final strategy.</p> <p>Please note that this is outside the scope of this Transport Strategy.</p>



7.32 Naas AFC Submission & Response

Naas AFC Submission	KCC Response
<p>There are very few dedicated walking areas and where there are they are usually crowded and don't offer much educational or "natural" experiences. The lack of any sensory based experiences for special needs specific adults and children is also badly needed. A Kildare based natural and local plants and wild flowers walkway is badly required. Naas AFC has the circumference of their pitches that would make a great local walkway that could incorporate all these factors and allow it to be supported and accessed by the local and larger communities.</p> <p>As part of this walkway we could also, if given the right space, incorporate a similar cycle pathway safely away from traffic for younger cyclists.</p> <p>In 5-7 years given the volume of housing in Naas the town will eventually grind to a halt. Far too much traffic going through and around the town that are not local. Huge problem coming down the line. Access to facilities and amenities is also under huge strain due to volume. We need more public areas!!</p> <p>Car parking in general is poor with high charges. Very poor town structure and a council that is not commercially minded enough. I moved my business from the town 10 years ago due to unrealistic rates and no support. It's no better now.</p>	<p>Please note that this suggestion is outside the scope of this Transport Strategy. However, there are greenways planned, for example between Naas and Sallins which will provide a "natural" experience to residents and visitors to the area. Please refer to Section 12 of the Transport Strategy for details.</p> <p>Please see previous comment.</p> <p>Please see previous comment.</p> <p>Parking was a key aspect of this transport strategy. Please refer to Section 12.5 for full details of the parking proposals put forward.</p>



7.33 Sallins Scout Group Submission & Response

Sallins Scout Group Submission	KCC Response
<p>Key for us is to be able to safely walk or cycle to school. There are no secondary school in Sallins, and the majority of post primary schools attended by Sallins pupils are in Sallins. The cycle route into Naas (along the Sallins Road and along main street to Monread) is just painted on the existing road and does not provide a safe route for the children of Sallins. The greenway from Sallins to Naas (along the canal) is marked as a medium term. This has been on the cards for years and the community were told it would go to Section 8 some time ago. This needs to be prioritised as a practical cycle route into Naas for the youth of Sallins.</p> <p>The walking route to the national school from the village centre is dangerous in the vicinity of the garage and the old Gala and crossing the of the bridge.</p> <p>PERM 16, to be prioritised to provide a safe cycleway for post primary pupils living in Sallins. As above - it needs to be safe to cycle to school from Sallins</p> <p>There doesn't seem to be any part of the strategy which addresses the developing traffic calming measure in Sallins. It will be important that transit through traffic is encouraged to use the bypass and that traffic in the village is mainly local traffic. Traffic calming measures should be integrated into the public realm plans so that the village is pleasant, enjoyable and safe for young and old pedestrians and cyclists.</p> <p>Heavy goods vehicles should be banned from the village unless they are delivering goods to businesses etc. We are very keen to see the plans for the development of the public realm in Sallins</p>	<p>Please note that design work on the Naas-Sallins Greenway is currently underway. However, projects of this scale do take some time to deliver.</p> <p>There will be a Public Realm section included in the final version of this Transport Strategy. As part of this Public Realm work, several measures were put forward to improve the current situation in Sallins. For example, at the garage.</p> <p>Please see previous response in relation to the Greenway.</p> <p>Please refer to previous response in relation to the Public Realm section of the Transport Strategy.</p> <p>This will be considered once the Sallins by-pass is complete and operational. This will be contained in the final version of the Transport Strategy.</p>



8.0 Public Consultation - Submissions & Responses

Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Cycling	C18	Sallins Road (in Sallins)	This should be a 2-way segregated cycle track and should be progressed as a near term priority. Some additional pedestrian bridges should be included over the railway and canal to create the necessary space.	This project will be a function of the adopted Local Area Plan, funding, resources and statutory processes. In relation to the design, please refer to the Explanatory Note in Section 4 of this Report.
Cycling	C25	Woodlands to Kingsfurze Avenue Proposed Link	This will not work as it will encourage extra footfall into Kingsfurze Ave estate. The current bike route through the laneway close to the estate entrance is sufficient and therefore no change is necessary. This objective would impact negatively on quiet, mature estates. Increased traffic into both estates would create a safety risk. There is a concern about anti-social behaviour. "The Dip" will be destroyed.	Cycling routes have been chosen to provide better access to public transport and more direct access to the town centre and schools. These routes will provide much safer and direct options for children and vulnerable road users. For this transport strategy, KCC have tried to avoid placing pedestrians and cyclists in direct conflict with traffic on busier roads.
Cycling	C28	Sallins Road to Millennium Park and Canal Greenway	Negative impact on the residents in Landen Park, Oldtown Demesne, including anti-social behaviour, health and safety and security risks. In addition, the boundary wall between Millennium Park and Landen Park / Oldtown Demesne is a protected structure and an area of mature trees. There are alternative access points nearby. There will be increased traffic and parking from cars to access the Naas GAA junior pitch. Cars will park in Landen Park during the day to access Millennium Park businesses.	Please refer to the explanatory note in Section 4 of this Report. In relation to the protected structure, any such features will be subject to detailed assessment and minimal disruption and KCC will employ the services of appropriate specialists.
Cycling	C34	Tipper Road	The narrowness of this road precludes it as suitable for a shared street improvement. There will be health and safety risks. The construction of an additional roadway The Gallops Avenue will simply provide an even further volume of traffic using the Tipper Road to access the town of Naas and would run completely counter to the proposal of a shared improvement as part of a strategy to increase cycle usage. This objective would provide no benefit in terms of increased access to amenities.	Please note that the objectives in this Transport Strategy are indicative at this stage and will be subject to detailed design. The points raised will be taken into consideration. Please refer to the Explanatory Note in Section 4 of this Report.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Cycling	C41	Gallops Avenue	General disagreement of the roads proposal and any associated cycle tracks or footpaths. Some comments suggest that The Gallops Avenue could be a greenway, i.e. pedestrian and cycling only.	Please refer to the detailed note on The Gallops Avenue in this submission report. The option of creating a greenway along this route was considered, however, it would be of very limited benefit and was not brought forward as part of the transport strategy.
Permeability	Perm 21,22,23 & 26	Perm 21: Pedestrian/Cyclist footbridge over Canal and associated path to link to Oldtown Demesne housing estate Perm 22: Permeability link between Naas Branch Greenway - Oldtown Demesne housing estate - Millennium Business Park - Sallins Road Perm 23: Permeability link between two housing estates; Oldwood - Oldtown Demesne Perm 26: Permeability link between Millennium Business Park - Sallins Road	<p>Negative impact on the residents in Landen Park, Oldtown Demesne and surrounding estates including anti-social behaviour, health and safety and security risks. Issues with accessing certain properties. The boundary wall between Millennium Park and Landen Park / Oldtown Demesne is a protected structure and an area of mature trees. There are alternative access points nearby. There will be increased traffic and parking from cars to access the Naas GAA junior pitch. Cars will park in Landen Park during the day to access Millennium Park businesses.</p> <p>In your Fig 13.3, Page 204, you indicate as far as I can see, at C22 and C23 new access ways for cycle and pedestrians between Landen Park and Millennium Park. Forgive me but I cannot reconcile your descriptions of C21 and C22 in the index table and the numbered locations of 21 and 22, which are in Landen Park and Old Town Walk, but described as Jigginstown in one case, which is the other end of the Canal beyond Naas harbour.</p> <p>Nevertheless, following your maps, there is already existing space to link the present cycleway junction at Old Town Walk to Millennium Park and Sallins Road...the space is vacant and available and merely requires path development and removal of the temporary wire fence obstructing that access today. Once the bridge at Landen Park over the canal onto the greenway is built, this will allow pedestrians and cyclists traverse between the canal greenway and Sallins road, with access to Millennium park at the junction of Old Town Walk and Landen Park.</p> <p>The permeability of these neighbouring estates might be better served if access to Millennium Park is made through The Enclosure in Oldtown Demesne. The Enclosure is the closer exit point to both Millennium Park and the Sallins Road, granting easy access to both Millennium Park and the train station in Sallins.</p>	KCC see these permeability links as key requirements to reduce the number of vehicular journeys as they will improve access to Naas town and schools.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Permeability	Perm 35	Public Transport Measure: Road with footpaths from Millennium Link Road - Abbey Bridge	Residents in Finlay Park object to the section of this link which turns off into a section of that estate. Environmental concerns, health and safety concerns.	This link is being proposed as a link for public transport and active modes of travel. It will improve access to the canal to all of the community, not just the residents of Finlay Park.
Permeability	Perm 36 & 37	Perm 36: Permeability link between housing estates; Rathasker Heights - Rathasker Road - Devoy Quarter Perm 37: Permeability link between housing estate Carraig Oscair - South Ring road	Negative impacts on residents, including privacy, anti-social behaviour, other suitable routes available. Perm 37 is on a dangerous hill with a 90 degree bend at the end.	KCC have considered the large volume of submissions in relation to these proposals. KCC will move Permeability Option No. 37 to the Rathasker Road. However, Permeability Option No. 36 will remain as an objective of the transport strategy as it is considered beneficial. Any such proposal will be subject to detailed design and points raised in objection to Perm 36 will be considered at this stage.
Permeability	Perm 4 & 6	Perm 4: Create permeability links between housing estates streets: Castlesize Lane - The Willows - Castlesize Walk - Castlesize Vale Perm 6: Create pedestrian/cyclist link between Castlesize Drive and Sallins Bypass	Negative impact to residents, including anti-social behaviour, health and safety risk, environmental concerns, unsuitability of road to accommodate pedestrians and cyclists. Previous agreement with KCC to have a safety boundary wall built around the green so that the residents would withdraw their objections to the road. Regarding permeability links between housing estates Perm 4: Castlesize Lane - Willows - Castlesize Vale please note your reference of these areas are wrong.	KCC have considered the large volume of submissions in relation to these proposals. KCC will remove Permeability Option No. 4. However, Permeability Option No. 6 will remain as an objective of the transport strategy as it is considered beneficial. Any such proposal will be subject to detailed design and points raised in objection to Perm 6 will be considered at this stage.
Permeability	Perm 42	Create southern entrance to two schools to link with existing path network near the lake	This proposal would destroy this beautiful recreational facility and the Fair Green areas.	The design of this link will address and minimise the effect on local amenity. Please refer to explanatory note in Section 4 of this Report.
Permeability	Perm 46	Create permeability link between; Thornbrook - R410	Concerns from nearby residents about safety, the traffic volumes on the R410, ground elevations and slopes, lack of pedestrian crossing and reduction in amenity value of green space.	This link would be for the good of the wider community and will provide access to schools. Appropriate crossing facilities should be included as part of the detailed design.
Permeability	Perm 47	Create path from Kingsfurze Avenue to Road Measure	Negative impact on the playground and community space for residents. Health and safety risk to children. Increase of traffic through a residential area. Limited benefit of the objective. Increase in cars parking in the estate. Environmental concerns.	This permeability measure has been removed from the transport strategy.
Permeability	Perm 48	Road Measure: The Gallops Avenue	General disagreement of the roads proposal and any associated cycle tracks or footpaths. Some comments suggest that The Gallops Avenue could be a greenway, i.e. pedestrian and cycling only.	Please refer to the detailed note on The Gallops Avenue in this submission report. The option of creating a greenway along this route was considered, however, it would be of very limited benefit and was not brought forward as part of the transport strategy.
Permeability	Perm 51	Create path between Broadfield View - R448	Link is unnecessary and will not benefit any pedestrians. There is a risk of anti-social behaviour and is a waste of public money. The elevation of the estate and road will mean a significant set of steps / or cycle ramp.	Please refer to the Explanatory Note in Section 4 of this Report. The purpose of this link is to provide better access to schools for children.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Permeability	Perm 53 & 55	Perm 53: Create path between Killashee View - The Drive housing estates Perm 55: Residential link from The Drive housing estate - Dunlavin Greenway	Negative impact on residents, school run car parking, health and safety, security concerns. There are alternative existing access routes within close proximity to these proposals.	KCC have considered the submissions in relation to Perm 53 and have decided to remove this from the transport strategy. However, Perm 55 will remain as a transport objective. Any such proposal will be subject to detailed design and points raised in objection to Perm 55 will be considered at this stage.
Permeability	Perm 66	Permeability link between housing estates Kingsfurze Avenue - Woodlands	No additional benefits with this route. Topography will require extensive groundworks .	This link will provide a hard surface for an existing informal route. This active mode link is not a precedent to a vehicular route and KCC have no ambition to make this a vehicular route in the future.
Parking	PK1	Expanded Park and Ride at Sallins Train Station	Site not suitable, should be used as a public green space. Will lead to increased traffic into the village. This option should be in the short term rather than medium term. Environmental concerns.	This site is more appropriate as a parking area given the difficulties currently faced by commuters and its proximity to the railway station. In relation to the timeframe for this proposal, it will be dependent on funding, resources and statutory processes. The detailed design of this project will consider environmental issues in detail, please refer to the Explanatory Note in Section 4 of this Report. In addition, please refer to the Public Realm section which includes details on streetscape improvements for Sallins.
Parking	PK2	Relocate Perpendicular Parking on Main Street and Sallins Road	Instead of PK2, pedestrianise Naas Main Street.	This option is considered unfeasible for the lifespan of this transport strategy.
Parking	PK3	New Town Centre Car Park Near Main Street	Negative impact on space currently used for recreation and festivals. This car park is badly needed in the short term. This car park is not required and there is already plenty of car parking spaces in Naas. Interaction of this car park with the proposed Harbour area bus interchange.	This site is more appropriate as a parking area given its proximity to Naas Mainstreet. In relation to the timeframe for this proposal, it will be dependent on funding, resources and statutory processes. This car park is proposed to serve the mainstreet of Naas and will be managed in such a way as to promote parking for business in town rather than commuting. KCC are looking to provide local bus services to provide access to the bus interchange, which will then provide transport to more destinations.
Parking	PK4	Poplar Square Plaza Development	Not clear who will benefit from this proposal.	Residents and visitors of Naas.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Parking	PK6A	Relocate Parallel Parking on Corban's Lane	None	Note that some respondents misunderstood the map. Objective PK6A refers to relocation of current parking along Corban's Lane and not the potential new school drop off area to the south of Naas CBS and St. Corban's Primary School. Comments in relation to this proposal are dealt with in PK6B below.
Parking	PK6B	Construct Formal School Drop-Off Facility for Naas CBS on one of the two sites indicated	Northern site, just off St. Corban's Lane: Safety issues for school children on a busy road. Southern site, near the Fair Green Area: Environmental impact on the Fair Green Area. Destruction of Fair Green and Lake Walk amenities. School traffic causing congestion. Archaeological site with historic moat wall.	The site of any potential school drop-off area will be subject to analysis of all options at project preliminary design stage. The options will be analysed in the context of the individual project and the most appropriate option chosen, in line with the Public Spending Code. Any environmental, archaeological and historical impacts will be considered at this stage.
Parking	PK8	Increased Parking Enforcement	Parking enforcement already very strong.	Greater enforcement would reduce instances of illegal parking which present hazards to cyclists and walkers to improve safety. If illegal parking is eliminated then fewer cycling routes will be blocked, and this will produce accessibility, physical activity and environmental benefits. Eliminating illegal parking is an integrated solution to aid the successful delivery of the cycling network.
Bus Interchange	PT1	Market Sq. Bus Interchange	Not very forward thinking, only local buses and shuttle busses should be allowed into the town centre.	This is a short term measure and it is planned that this interchange will be moved to the Harbour Area in the longer term.
Bus Priority	PT10	Priority Entrance to Pipers Hill for Buses	This option is required without delay. Transport access should have been addressed at planning stage instead of allowing this issue to develop. It is constantly getting worse with more houses being built and all are using 1 exit and entrance.	Noted. This proposal is planned as a short term measure. It is accepted that there are problems with access to Pipers Hill and over use of vehicular movement in this area.
Bus Priority	PT11	Bus-Only Link to Sallins Bypass	There is a concern that this road would become a private vehicle road rather than just public transport only. Will the ERM be sufficiently refined to provide accurate results?	This study cannot prevent future statutory decisions, however it is unlikely that this road would be classified as anything other than public transport. We note the comment in relation to the ERM and we are aware of this limitation.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Train	PT12	Lobby for a Second Station with Park and Ride Facility to the West	This will make the overall journey for commuters from Kildare longer. This second train station will lead to more volumes of car usage.	Please refer to the Explanatory Note in Section 4 of this Report which explains that these proposals will be analysed in significant detail at design stage.
Train	PT13	Lobby for Extension of DART Services with Quad Track	General agreement with this objective.	Noted by KCC that this proposal is supported by the community.
Bus Interchange	PT2	Harbour Bus Interchange	Negative impact on residents in Naas and in vicinity of the proposal, including visual, environmental, traffic issues, safety and parking concerns.	The Harbour Area is a significant resource to the town of Naas. The realisation of this resource will require development in the area which, it is hoped, will enhance the amenity and economic development of the area. In the event that the sighting of a Bus Hub is an objective of the LAP then that project will be the subject to the normal design process. This will include a complete project appraisal which includes a Multi-Criteria Analysis (MCA) and environmental analysis which would analyse the effects on the environment. The concerns are noted, and it would be important to examine the matter raised in the analysis of the environmental effects of the proposal. It should be noted that the overall national and regional policy framework considers the intensification of the town centre to be a core requirement. This would suggest that there will be an intensification of development in the town centre which might include the harbour Area and approaches.
Bus route	PT4	Western Spine Local Bus Route	Negative impact on residents in Naas and in vicinity of the proposal, including environmental impact of double decker busses and privacy concerns.	The purpose of providing local bus routes is to allow people to avail of public transport and reduce car demand. While there are some emissions from the busses, this will be significantly less than that from the equivalent number of cars necessary to transport the same volume of people. There are no plans to use double decker busses.
Bus Priority	PT7	Sustainable Travel Bridge Over M7	Contrary to established land use policy. Opening of Sallins by-pass will negate the need for this proposal.	Please refer to the Explanatory Note in Section 4 of this Report which explains that these proposals will be analysed in significant detail at design stage and other options will be considered as part of this process.
Bus Priority	PT8	Morell Way Bus Gate	This proposal would face local objection.	We consider that this is a very desirable and beneficial proposal as it provides a public-transport only way through a residential area. This will give public transport an advantage over private car usage and promote modal shift to a more sustainable mode of transport.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Bus Priority	PT9	Left Turn Ban on to Naas Main St. for Non-Bus Traffic	Will force traffic onto residential roads and the new Millbridge Street. Issues with accessing primary schools and supermarkets in the town. Traffic safety issues. Impact on St. Corban's school.	Please refer to the Explanatory Note in Section 4 of this Report which explains that these proposals will be analysed in significant detail at design stage.
Roads	RD1	The Gallops Avenue	This is covered extensively in the dedicated note within this submissions report.	This is covered extensively in Section 5 of this submissions report.
Roads	RD2	Upgrade of Murtagh's Corner Junction and Link Road to Corban's Lane	This should be fast tracked to the short term. There may be safety issues directing traffic past a school.	This project will be a function of the adopted Local Area Plan, funding, resources and statutory processes. In relation to the road safety, this project would be subject to careful appraisal and detailed design, please refer to the Explanatory Note in Section 4 of this Report.
Roads	RD3	Millbridge Street	Negative impacts on residents, lack of specific engagement with the community. Traffic issues at junctions and health and safety risks. Route will create a rat run and attract school run traffic. Proposal would increase traffic on already congested Sallins Road. Environmental concerns, pollution, noise, safety on roads, impact on green amenity areas, wildlife sanctuary and canal.	This is covered extensively in Section 6 of this submissions report.
Cycling		Back entrances of schools not open and this discourages children from cycling to school	Although the at present there are cycle lanes on the ring roads at the periphery if the town cycle lanes to and through the town are virtually non-existent This is especially true for students of St Mary's, Gael Cholaiste Chill Dara and the CBS when forced to use the front entrance of the school. Many estates cannot be traversed at the moment, in some cases blocked by just a wooden fence, but If they could be opened up for cyclists/pedestrians it could take a lot of vehicular traffic off the roads during the morning rush hour. It is interesting to note that the back entrances to, at least St Mary's and the Gael Cholaiste, could be used effectively through the canal and the Devoy link Road respectively. I think the schools should be encouraged to promote cycling by having these back entrances accessible in the mornings/evenings. Many parents are afraid to let kids cycle at the moment as it just isn't safe when using the main roads to the schools' front entrances	Agree with this comment. The Naas/Sallins greenway will help to provide access to schools. KCC will endeavour to engage with schools to look at all possibilities to promote cycling to school



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Cycling		Bike lockers at public transport links.	Strategy should include for this objective	Noted and agreed
Cycling		Bike parking at the hospital	Strategy should include for this objective	Noted and agreed
Cycling		Sallins local area plan 2016-2022	The Naas/Sallins transport strategy does not mention or refer to the Sallins local area plan 2016-2022 which contains movement objectives for Sallins & does not fully align with these objectives. The aforementioned plan also contains objectives for streetscape improvements to Sallins Road which includes for cycle lanes. The Sallins local area plan 2016-2022 states that Pedestrian & cycling within Sallins should be greatly improved through the provision of the SALLINS ROAD pedestrian/cycling scheme which is a Part 8 development to be carried out by KCC. Sallins Road is the primary artery through Sallins & with the new bypass in place provides opportunity for an enhanced streetscape that gives primacy to pedestrian & cyclists benefitting the residents of Sallins	In relation to the enhanced streetscape, please refer to the Public Realm section in the final Transport Strategy Document. The Naas / Sallins Transport Strategy has taken into consideration the movement objectives of the Sallins Local Area Plan 2016 – 2022 and has incorporated them where required.
Cycling		Lack of table headings at the top of new pages	Page 172 is part of a very long table where there are no headings on each page, so you have to go back to the first page of the table to see what the heading is	Agreed, this has been amended in the final Transport Strategy document
Cycling		Cycle and pedestrian link from the Oldtown Demesne estate areas to the grand canal	A simple, relatively inexpensive option with enormous benefits would be to finally construct the long awaited cycle and pedestrian link from the Oldtown Demesne estate areas to the grand canal. This was a planning condition many years ago not enforced by KCC / NTC. More recently several local Councillors have been elected having promised to deliver this and they need to deliver before the next election	This is already addressed by permeability links 21 and 25.
Cycling		Grand Canal Greenway	This needs to be prioritised	This project is in progress
Cycling		Segregated Naas to Sallins cycle route	Strategy should include for this objective, there is sufficient space for it	This idea was investigated previously and found to be impossible
Cycling		Designated cycle lanes from Naas ball to town.	Strategy should include for this objective	Please refer to the Dublin Road scheme, objective C5
Cycling		More cycle lanes near Ballycane	Strategy should include for this objective	See cycling objective C7
Cycling		Road between bundle of sticks roundabout and Aras na riog	The road between bundle of sticks roundabout and Aras na riog should have a cycle lane added as today cyclists in the hard shoulder are threatened by cars	There is not enough space to accommodate this
Cycling		Bicycle route from Sallins to Naas, Millennium park and beyond	Strategy should include for this objective	This will be achieved through objective C1, the Naas-Sallins Greenway
Cycling		Segregated Cycle lane to Dublin	Strategy should include for this objective	This is outside the scope of this transport strategy
Cycling		Bicycle hire	Similar to that operated in Dublin and other major cities. This would allow people access to town and from bus stops on the outskirts of the town	Naas is not big enough and does not have the critical population mass to support such a proposal



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Cycling		Lack of walkways and cycleways in the Jigginstown area	Strategy should include for this objective	Please see C15 and C22
Cycling		Dutch cycle design	All planned cycleways should be reviewed to incorporate good junction design for all minor roads. Where possible Dutch cycle design should be looked at for examples of how best to prioritise pedestrian and cyclist movement	Junction design will be considered at detailed design stage. Please refer to the Explanatory Note in Section 4 of this Report.
Cycling		Increased signage required to remind drivers of cyclists	Increased signage required to remind drivers of cyclists on local roads eg Tipper Road, Blessington Road etc.	This will be considered at detailed design stage. Please refer to the Explanatory Note in Section 4 of this Report.
Cycling		Cycling lane needs to be added to the main Sallins road and over the canal	Cycling lane needs to be added to the main Sallins road and over the canal so that school children can cycle carefully over the bridges	The Naas-Sallins greenway will take cyclists away from busy streets
Cycling		Concerned at the widespread use of shared street schemes	Concerned at the widespread use of shared street schemes. This looks like an excuse to permit the status quo, whereas the National Cycle Manual states that "cyclists and pedestrians take precedence over vehicular traffic". I find this hard to imagine on Monread Avenue, a busy residential road. The intention will certainly be compromised in reality unless significant traffic calming measures are put in place, such as chicanes, lane narrowing etc.	KCC accept that where possible, cycle facilities should be segregated when there are significant traffic volumes. KCC will endeavour to do so as part of the detailed design. However, this is not always possible and shared street options are a solution so that cyclists are not precluded
Cycling		Length of time to deliver projects	Concern over how much is being pushed into the medium term, since a lot of these measures (Greenway, Dublin Road, Poplar Square) have been in train for 5 years + already	The time period for each objective has been proposed in light of the requirements for funding, as well as resources needed to complete the statutory processes, design and construction of the scheme
Cycling		A segregated cycle track from Sallins greenway at the Sallins primary school, connecting all the way out to the new park at Kerdiffstown	Strategy should include for this objective	This is outside the scope of this transport strategy
Cycling		Bridge over the N7 between Sallins and Naas is particularly hazardous for cyclists	The bridge over the N7 between Sallins and Naas is particularly hazardous for cyclists who come off / enter the Millennium roundabout onto the bridge footpaths at pinch points where vehicles often come close to clipping the bicycles, then walkers and cyclists have to share footpaths creating hazards to each other on a very busy bridge	We agree with this comment and have proposed a new bridge to the east to accommodate cyclists and pedestrians as part of this Transport Strategy (PT7 - sustainable travel bridge)



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Cycling/Pedestrian		Negative impact of cycling/pedestrian bridges over canal	Impact on Abbey Bridge and Abbey Road	Please refer to Explanatory Note in Section 4 of this Report.
Miscellaneous		New school in Millennium Park	Ref: 2.2.1 Naas Community College is a Secondary school, currently located at number 10 on your map but with a building under construction in Millennium Park	Noted
Miscellaneous		National Cycle Manual	Page 212 talks about NCM standard and doesn't explain what it is	Noted and amended
Miscellaneous		Impact of Covid-19	The impact of Covid-19 on traffic patterns should be considered as part of the strategy	It is expected that the response to Covid 19 (in terms of traffic movement) will be done over a short period. This strategy has a longer perspective and does not negatively impact any response to Covid 19.
Miscellaneous		Consider providing many more seats in the public realm	Strategy should include for this objective	This is a matter for the detailed design of the Public Realm projects and also the Naas Area Office
Miscellaneous			Please align the transport strategy with the Programme for Government	We have. The transport strategy provides many objectives to promote active travel. The transport strategy is also aligned with National and Regional Planning strategies
Miscellaneous		MCA Analysis Methodology	The criteria used in the Multi Criteria Analysis (MCA) are not weighted (for example giving equal weight to economy and integration, where integration with statutory planning policy has to be a pre-requisite, not simply a variable). These criteria, when used to choose between options, is inconsistent even within a single group of options (as well as generally throughout the Strategy)	Please refer to the Explanatory Note in Section 4 of this Report in relation to how specific projects will be assessed. The multi-criteria analysis developed for this strategy is very high level and only provides an outline. Each specific project will be subject to its own cost-benefit analysis, detailed MCA, etc.
Miscellaneous		Leisure Parks proposed for the Kerdiffstown Dump site and the site in Sallins (approx. 37 acres) coming on stream as a consequence of the Sallins By-pass	Strategy should take account of these developments	KCC have taken account of current zoning and potential future zoning provided indicatively by the KCC Planning Department. Any new developments will feed into the new LAP and there will be an analysis associated with this LAP as it is developed



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Miscellaneous		School and workplace opening and closing times	School and workplace should have staggered timings of start and finish and should be incentivised to do so if required	This is outside the scope of this Transport Strategy. This is a matter for individual businesses and the Department of Education
Parking		Existing underground carpark near Sallins Train Station	This should be reopened and used for train station car parking	This is a private car park and plans for its reopening is outside the remit of KCC.
Parking		Parking in residential estates near Sallins Train Station	Issues with access for residents and very inconvenient	<p>Parking in Residential Estates In relation to parking residential estates it is Kildare County Councils position that vehicles can park on a public road provided that they are taxed and insured and are not blocking the roadway. Once a road is taken in charge by Kildare County Council, it becomes a public road and is not a private estate road.</p> <p>Where parking in a particular estate has reached a nuisance or dangerous level the residents of that estate can apply to have a pay and display scheme implemented in the estate, this must be supported by a majority of residents. As Pay and Display parking schemes are under the control of Bye-Laws they require the approval of the full Council. Generally speaking, Pay and Display schemes are appropriate in areas where:</p> <ul style="list-style-type: none"> • High levels of non-regulated parking is creating an unsafe situation • No parking is available to local residents because of all day commuter parking • All day parking near commercial centres is reducing the turnover of vehicles <p>In order for the Council to consider implementing the Pay & Display Parking Control Scheme in a particular residential area, representations should be made by either the local Residents Association with an accompanying petition, or a petition from a representative number of residents requesting the implementation of Pay & Display. This should be forwarded to Senior Executive Officer, Parking Section, Transportation Department.</p> <p>Double Yellow Lines Double yellow lines are used to prohibit parking where it may be causing a traffic hazard. Double yellow lines are only installed to remove parking that is causing a traffic hazard or preventing free flow of traffic at junctions, bends etc.</p> <p>The Road and Traffic Section will not install double yellow lines to control nuisance parking but may install them as part of a Pay and Display scheme.</p>
Parking		Duration of on-street parking in Naas	The duration allowed for on street parking is too short at 1 hour. This forces people into private car parks or run the risk of getting a ticket.	This is a matter for the parking section within KCC, these comments have been passed to them. This issue is outside the remit of this transport strategy.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Parking		Pay by card/pre booking spaces/security for parking	Strategy should look at these ideas	This is a matter for the parking section within KCC, these comments have been passed to them. This issue is outside the remit of this transport strategy.
Parking		Cost of parking	Paying on app costs more than machine. Very confusing and unfair system. Common parking charge required.	This is a matter for the parking section within KCC, these comments have been passed to them. KCC controls substantial areas of parking in Naas and is consistent. However, private car parks set their own rates and KCC do not have control over this. This issue is outside the remit of this transport strategy.
Parking		Accessibility for wheelchair users	Wheel chair/ parking permit users have to park at the canal and the footpath is too small in places	Agreed, KCC wish to improve access and parking for the disabled. However, this is beyond the scope of this study. Accessibility is addressed as an objective in the Local Area Plan. These issues would be subject to a separate accessibility study.
Parking		Alternative locations for a Park and Ride	The Park and Ride should be located on the ring road/Sallins bypass or the old abandoned site opposite the Big Ball or next to the Kerry Group premises	The location chosen in this transport strategy provides the best location for commuters accessing the train station and will not have a negative impact on the capacity of the national road network.
Parking		Free parking in Naas Town	Suggest focus should be on free/low cost parking to encourage footfall in town Centre.	The purpose of this strategy is to remove unnecessary journeys and replace with Public Transport. Paid parking facilitates turnover of parking and is a benefit to businesses.
Parking		Reduce parking in Naas Town	Parking strategy should aim to reduce on-street parking in Naas town centre	The Transport Strategy aims to achieve this by removing some parking on Naas main street and providing more car parking near the town centre
Parking		Cost of parking in Naas Town	High and not consistent	KCC controls substantial areas of parking in Naas and is consistent. However, private car parks set their own rates and KCC do not have control over this.
Parking		Parking improvements in Sallins	Outside of the train station, no further proposed parking improvements for Sallins.	The Transport Strategy concluded that none were required.
Parking		Electric vehicle parking	Electric vehicle parking must be given priority with on street charging facilities made widespread.	This is a matter for the parking section within KCC, these comments have been passed to them.
Parking		Parking for the Greenway	Parking could be provided for persons who walk and cycle the Greenway / Naas Canal	This point will be considered in light of demand that might develop once the Greenway is delivered



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Parking		New parking at Sallins Celtic Football Club	Proper parking facilities should be provided to Sallins Celtic Football Club as this would make the main spine road of the Castlesize Park estate safer for Children, Pedestrians and Motorists alike.	<p>Parking in Residential Estates In relation to parking residential estates it is Kildare County Councils position that vehicles can park on a public road provided that they are taxed and insured and are not blocking the roadway. Once a road is taken in charge by Kildare County Council, it becomes a public road and is not a private estate road.</p> <p>Where parking in a particular estate has reached a nuisance or dangerous level the residents of that estate can apply to have a pay and display scheme implemented in the estate, this must be supported by a majority of residents. As Pay and Display parking schemes are under the control of Bye-Laws they require the approval of the full Council. Generally speaking, Pay and Display schemes are appropriate in areas where:</p> <ul style="list-style-type: none"> • High levels of non-regulated parking is creating an unsafe situation • No parking is available to local residents because of all day commuter parking • All day parking near commercial centres is reducing the turnover of vehicles <p>In order for the Council to consider implementing the Pay & Display Parking Control Scheme in a particular residential area, representations should be made by either the local Residents Association with an accompanying petition, or a petition from a representative number of residents requesting the implementation of Pay & Display. This should be forwarded to Senior Executive Officer, Parking Section, Transportation Department.</p> <p>Double Yellow Lines Double yellow lines are used to prohibit parking where it may be causing a traffic hazard. Double yellow lines are only installed to remove parking that is causing a traffic hazard or preventing free flow of traffic at junctions, bends etc.</p> <p>The Road and Traffic Section will not install double yellow lines to control nuisance parking but may install them as part of a Pay and Display scheme.</p>
Permeability		Greenway 16 and 62	Greenway 16 and 62 should be joined up together. There is a break on the Caragh Road	Accepted, the Transport Strategy has been amended.
Permeability		The Close and The Court - Sallins	Need for footpath in this estate. The green area between The Court and The Close in Sallins Park lacks permeability, as the footpaths into both roads are absent, and there is no footpath down the green to link both ends to allow pedestrians walk it and create permeability.	This is outside the scope of this transport strategy.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Permeability		New school in Millennium Park	The Draft includes a comprehensive list of schools in the Naas/Sallins area the Strategy. While it mentions that Naas Community College will be relocating from its current temporary location in Craddockstown to the Millennium Road, none of the options presented reflect this, notwithstanding the fact that construction on this new school is already underway. With c. 1000 students attending from day 1, many of whom will be coming from the Greater Naas Area (outside the Study area chosen for the draft Strategy) not attention has been given to the consequences of increased movement. In addition, while continuously referring to the 1KM range for schools, it is unclear whether a simple disaggregated survey of schools has been done. If so then the consequential movement of students from Rathmore, Kill, and TwomileHouse National Schools into secondary schools in Naas should have been included in the discussion regarding the impact on traffic movement.	In relation to objectives to serve this new school, please refer to the cycle map. There will be a new Naas - Sallins Greenway and there are existing cycle lanes on the ring road. We accept that the siting of large schools away from urban centres will encourage vehicular traffic. However, this is outside the remit of KCC and is best addressed by the Department of Education. School journeys to the new school at Millennium Park have been accounted for in the transport model.
Permeability		Naas - Sallins Greenway with extra pedestrian / cycling bridges joining this Local Greenway with the Grand Canal Greenway	Safety concerns for cyclists and pedestrians at the bridge in Sallins.	This is a matter for detailed design. Please refer to the Explanatory Note in Section 4.
Permeability		Walkway to be introduced between Stoneleigh and new houses	Concerns about negative impact of this walkway.	This is a function of the existing planning permission
Permeability		Pedestrian crossings	Various suggestions for new pedestrian crossings in Naas.	New pedestrian crossings are a matter for the Naas area office.
Permeability		Accessibility	Various comments and suggestions to improve accessibility for vulnerable road users the community in general.	This is outside the scope of this transport strategy. However, KCC support these suggestions. The Local Area Plan has an objective for accessibility.
Permeability		Access to Sallins Train Station	It is not possible to walk into the station on the Platform 2 side without stepping off the narrow footpath. Cars often drive up on this footpath when leaving the station in order to turn left.	Comments noted, however this is outside the scope of the transport strategy.
Permeability		Pedestrianising areas along the Canal	For example, pedestrianising between Mill Lane and Osberstown or from Tandy's Bridge to Naas Harbour	The proposed Greenways will provide long stretches of car-free walks and cycle ways
Permeability		Heritage and Historic Trail	A number of closed areas to pedestrians in Naas should be addressed - specifically the environs of St David's church and graveyard, the gifted De Burgh Lands as two important examples. A better heritage and historic trail should be supported and walking tours of heritage areas encouraged.	This is outside the scope of this transport strategy.
Permeability		Access to Schools in Sallins	Sallins need safer walk ways to the primary school and the new NCC that will be opening on the Millennium road	The Greenway will improve access to the primary school.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Public Transport		Cost of busses and cost complexity	Busses too expensive, and cost structure is complex. Need the integration of contactless travel cards (LEAP) and integration of payment with CIE services (e.g. feeder bus fare greatly reduced/free if leap card is also used for rail service within 90 minutes)	Cost of bus fares and fare structure is a matter for bus providers and is outside the remit of KCC However, we have added an objective to the transport strategy to lobby for integrated ticketing, improved services to town, increased bus capacity and frequency and improved accuracy on arrival and departure times.
Public Transport		Bus stops	Additional bus stops needed in various locations around Naas and Sallins, for example bus stop (towards Nass town centre) inbound at Jigginstown	Agreed, bus stop added to this location as an objective in the Transport Strategy Report.
Public Transport		Submission about need for shuttle bus services through dense residential areas	Naas needs a rapid shuttle, servicing all the dense residential areas, avoiding the congestion of main street and Sallins road.	Please refer to Section 8.4 of the Transport Strategy Report, which has been expanded to include text on why the orbital bus route option was not brought forward as part of the Transport Strategy.
Public Transport		Error on map	Ref:8.12, Map is missing School - Scoil Bhride, Sallins Rd	Please note that this map is quite general, a more detailed map of schools is included in Figure 2.4.
Public Transport		Timetable information, particularly for the shuttle bus between Naas and Sallins is poor	No visible timetable exists at present in Naas or Sallins. Also, no information of pick up point is available in both Sallins and Naas.	KCC note your concerns and we will refer this to the NTA who provide licences
Public Transport		Accessibility of busses	Issues with accessibility of busses for wheelchair users	KCC support accessibility, while this matter is outside the scope of the transport strategy, we will refer your comments to the NTA
Public Transport		Sallins to Dublin bus route	No link from Sallins to Dublin via bus	This is outside the scope of this transport strategy, however we will forward your comments to the NTA
Public Transport		Bus 139 in Sallins	This bus does not stop in Sallins	We note your comments and we will refer to the NTA as this is outside the remit of KCC.
Public Transport		Bike transport on busses	Bus with bike storage too would encourage people to cycle to bus stations and use the bus if they can take the bike on the bus.	We note your comments and we will refer to the NTA as this is outside the remit of KCC.
Public Transport		Train timetables - first and last trains	Trains need to start earlier and finish later	We are lobbying for increased frequency of train services.
Public Transport		Additional train station on the ring road	This would be very beneficial and KCC should do everything in its power to lobby for this	This is beyond KCC's remit. However, the comments are noted. Delivery of capacity increases on the railway including a second station or more platforms will fall to the NTA and IE. However, KCC would like to see increased capacity for train passengers.
Public Transport		Frequency of busses in Naas and Sallins not sufficient	Both long distance and local bus services are not frequent enough to serve the needs of Naas and Sallins	KCC have added an objective to the transport strategy to lobby for integrated ticketing, improved services to town, increased bus capacity and frequency and improved accuracy on arrival and departure times.
Public Transport		School bus links	In particular, no link to Caragh village school	We note your comment, however this is outside the scope of this transport strategy. School bus services are in the remit of the Department of Education.



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Public Transport		Additional local bus routes	Various suggestions for additional local bus routes. For example; route that links Johnstown, Kill, and Caragh via the interchange in Naas; Bus up and down Monread to get to cinema to Sallins and shuttle bus to and from Tesco from the Train station	The route suggested for Johnstown, Kill and Caragh is outside the scope of this transport strategy. There is a new bus route suggested for Monread. This eastern spine will also connect Monread shopping centre with the train station in Sallins
Public Transport		Naming of bus stops	Names of bus stops in Sallins do not make sense, e.g. "St Brigid's" bus stop is at Sallins Park, "Sallins Post Office" bus stop is nowhere near the post office.	We note your comments, however, this is outside the remit of KCC and is a matter for the bus providers
Public Transport		School busses in the morning at Sallins	Large amount of kids gather in the centre of the village, lack of foot paths and dedicated bus stops.	We accept your point, however, school bus services are in the remit of the Department of Education
Public Transport		Train station in Naas	This should be reopened	We note your comments, however, this option is not feasible
Public Transport		Local school hubs	If there were school bus hubs scattered about residential areas, or on the approach to the town (along ring roads), cars can drop off and continue the journey and avoid going to the centre of town.	The transport strategy has provided for new local bus services to improve access for school children. The purpose of the strategy is to replace vehicular traffic with public transport and active more journeys, not to encourage additional journeys to park and ride facilities
Roads		Piper's Hill School Campus	A new exit is drastically needed to try and alleviate the congestion experienced daily at the schools on this campus	The strategy examines the provision of a separate bus entrance and local bus service to the school, to achieve the objective of reducing car use, improving car access would not support the achievement of this objective.
Roads		Figure 9.8	Pg 119: There's a reference to a Figure 9.8 on this page, but it must be incorrect as 9.8 refers to a Millbridge proposal	Noted and amended
Roads		Specific traffic issues in Naas Town	For example, trucks using the road Waterways past the school up Canal View to access Main Street using the down ramp in the wrong direction, issues with entrance to Dunnes Stores supermarket.	Using the down ramp in the wrong direction in Sallins is a matter for garda enforcement. The road markings clearly indicate the correct direction. Dunnes Stores: This has been directed to the Planning Department to ensure that Dunnes Stores are complying with their planning permission.
Roads		Ban of HGV's in Sallins	A bylaw banning HGVs (except for local access) should be applied to Sallins road in Sallins. This would benefit pedestrian/cyclist safety as we are reducing the noise and emissions that accompany these big trucks.	This may be looked at when the Sallins Bypass is complete and operational
Roads		Traffic noise, particularly on the South Ring Road	Significant noise issues around some estates in Naas.	This is addressed in the KCC noise action plan but is ultimately a matter for the developer of the estate in the first instance



Strategy Strand	Objective	Description	Key issues raised in public submissions	KCC Response
Roads		Outer Orbital Route	Suggestions that this would be more forward thinking and beneficial to Naas than the Gallops Avenue.	The traffic analysis has clearly shown that the outer relief road option is not the optimal solution. A bypass of the town would be beneficial if most of the traffic thorough the town was "through traffic". However, this is not the case in Naas. Two independent reports undertaken by independent consultants have reached this conclusion. In addition, the new National Planning Framework will constrain growth around the periphery of Naas.
Roads		Traffic lights to access estates	Traffic lights would be an advantage on the Kilcullen Rd as school times make it very difficult for residents to exit estates on the road at these times	This is outside the scope of this Transport Strategy
Roads		Traffic calming in Sallins	With the Sallins By Pass due for completion soon, one would hope traffic volumes through the town would decrease. This would then be the opportune time to install traffic calming measures in Sallins.	Please refer to the Public Realm section of the Transport Strategy
Roads		Speeding along ring roads	Traffic speeds on the ring roads should be addressed - there is a speed limit in operation but it is rarely adhered to.	Speeding is a matter for enforcement
Roads		Traffic signals should prioritise pedestrians	All pedestrian crossings should favour the pedestrian on demand to ensure safe crossing. At the moment, there is a long delay between pressing the button and getting a green crossing for pedestrians, so much so that people will cross in between traffic, including children.	This comment will be communicated to the traffic signals section of KCC
Roads		Kill and Johnstown	Unfortunately Kill and Johnstown were left out of the plan but cycling and walking links to Naas/Sallins need to be developed as a priority as the currently infrastructure is a shared pathway with inaccessible part for bikes, buggies and wheelchairs (such as at the old concrete factory). Those villages should also have through traffic removed as rat running occurs due to congestion on the N7.	This is outside the scope of this transport strategy
Roads		30km/hr Speed Limit	There is no mention of a 30km/hr speed limit, this would have major benefits, both from a tangible safety point of view, and from the vulnerable road users perspective adding more tolerable conditions in what is still generally proposed as a mixed traffic and VRU transport mix (shared streets etc).	This will be considered as part of the speed limit review currently being undertaken in KCC
Roads		Collaboration between AECOM and KCC in developing options	On page 139, there's a comment from Aecom that the road links included in the permeability strategy were provided by KCC. Aecom are being paid to put the strategy together, so why did they not come up with the road links themselves?	Across all strands of this Transport Strategy, there was considerable collaboration between KCC Roads and Transport technical staff and the Consultant AECOM. This collaborative approach ensured that local knowledge was utilised in developing the strategy.



9.0 Main Changes to the Final Draft Strategy & Conclusions

This report summarises the significant volume of submissions made during the second consultation period for the Naas/Sallins Transport Strategy. The submissions received were very valuable in allowing Kildare County Council to understand people's concerns. Kildare County Council would once again like to thank the Public and Stakeholders for taking the time to voice their thoughts and make submissions.

Following consideration of submissions made by both the Public and Stakeholders on the Draft Naas / Sallins Transport Strategy, a number of changes were made to the report. Many of these changes were minor changes to the wording. However, there were some larger changes which were made in light of the submissions. These are summarised in Table 9.1 and Table 9.2 below:

Table 9.1: List of Strategy Measures Removed or Modified as a Result of Stage 2 Consultation

Transport Mode	Measure	Changes Made
Permeability	PERM 4	Removed
Permeability	PERM 37	Connection moved to Rathasker Road
Permeability	PERM 47	Removed
Permeability	PERM 53	Removed
Permeability	PERM 62	Greenway extended to connect to Naas-Sallins greenway
Cycling	C 13	Changed from cycle track to shared street



Table 9.2: List of Additional to the Strategy as a Result of Stage 2 Consultation

Transport Mode	Section	Changes Made
Cycling	Cycle Objectives	Text added to the 6 th cycling objective to mention making cycling easier to school.
Cycling	Cycle Parking Text	Text added to this section stating that the Council will lobby Irish Rail to provide bike lockers at the station.
Public Transport	Public Transport Measure	New public transport option created to lobby local bus providers to provide integrated ticketing, improved services, increased frequency and improved reliability. This measure is adopted as a short-term public transport measure in the strategy.
Public Transport	Public Transport Measure	Additional eastbound bus stop added to the R445 in Jiginstown, opposite the existing westbound bus stop.
Permeability	Permeability Option Development Text	Text added to this section noting that a permeability link may be added to the De-Burgh estate to link it with the Naas-Sallins Greenway. This measure will be determined during the detailed design of the greenway.

It must be noted that although there were a large volume of issues raised in relation to some objectives of the transport strategy, many of the concerns voiced will be taken into consideration when the project is brought forward for appraisal and detailed multi-criteria analysis. This is discussed in Section 4, the Explanatory Note.