



27 September 2017

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

Submission on Celbridge Local Area Plan 2017-2023 (Direction 2017)

Dear Sir / Madam

Celbridge Community Council was established as a voluntary community group in 1975 and has for over forty years been actively involved in many aspects of community life in Celbridge. Our goal is to promote and improve community life and to influence in a positive way the physical development of the area for the benefit of all those who live and work there. As a voluntary group, Celbridge Community Council welcomes the opportunity to make a submission on the draft Minister's Direction on the Celbridge Local Area Plan 2017-2023.

1. Donaghcumper Key Development Area

Celbridge Community Council is not in favour of the Minister making a direction to replace the F2 zoning (Strategic Open Space) with A zoning (Town Centre) per the Draft Celbridge Local Area Plan 2017-2023 published by Kildare County Council on 13th December 2016.

Celbridge Community Council strongly supports the principle of zoning lands in a sequential manner concentrating new developments close to the town centre and to high capacity transport facilities but does not feel that this principle can be applied to the lands within the Donaghcumper demesne due to environmental, ecological, heritage and amenity concerns.

While the Main Street is the historic centre of the town, the reality is that future development will result in increased activity west of the current town centre and this is likely to introduce demand for town centre type development west of The Mill. The institutional lands of St. Raphael's (Oakley Park) have already been zoned for a town centre expansion and Celbridge Community Council does not feel that 2 town centre expansions are merited.

The proposed development would adversely impact on the following:

- the potential of Celbridge to develop its tourism and heritage assets

The Local Area Plan made more of the potential of the town's heritage and tourism assets than of anything else that might contribute to Celbridge's economic development. The 2016 Celbridge Heritage and Tourism Strategy acknowledges that the Castletown and Donaghcumper landscapes are the backdrop to the historic village core and are critical for the on-going development of heritage tourism.



- the character and setting of the internationally important OPW maintained Palladian mansion Castletown House with its panoramic views of the surrounding countryside and the designed landscapes of the historically linked demesnes of Castletown, St. Wolstan's and Donaghcumper

These demesnes are protected by Policy HLA1 / Objective HLAO1.1 of the Local Area Plan which aim to protect the special landscape character of historic landscape areas and ensure that new development enhances the special character and visual setting of the historic landscapes and to prevent development that would have a negative impact on the character of the lands within the Historic Landscape Areas. The 3 demesnes are identified together as a single "Character Area" in Appendix 1 "Historic Landscape Areas – Character Areas".

- the biodiversity and ecology of the River Liffey

This is a known habitat for species of wildlife, including bats, that require protection under the Habitats Directive. Light and noise pollution coupled with constant human disturbance would impact adversely on the entire ecosystem.

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- highlights the position of thousands of local residents down the years as evidenced by submissions on previous planning applications for the site and on development plans.
- reiterates concerns identified by An Bord Pleanála (PL 09.233937 and PL 09.236613) in its refusal to grant permission for development of these lands due to proximity of the lands to Castletown House and demesne, the impacts of the developments on this very significant historic structure, the impacts on Donaghcumper itself, conservation of the historic designed landscape, and conservation of the natural landscape and the protection of the entire riparian environment within the Liffey Valley.

The genuine concerns raised by all of these people and upheld by An Bord Pleanála have not gone away just because the country is suffering from a housing crisis. We cannot have future generations look back on yet another poor planning decision which irrevocably changes the landscape of our town.

Celbridge Community Council is not convinced that the proposed KDA (or any non-amenity development) at Donaghcumper would be sympathetic to the natural beauty, designed landscapes, built heritage or ecology of the area and thus favours retention of F2 zoning to protect these lands into the future.

While not in favour of the originally proposed KDA, Celbridge Community Council would be supportive of the lands between the River Liffey and proposed KDA being developed as public parkland with landscaping to enhance the amenity value of the river. There is precedent for such development at the award winning Liffey Linear Park in Newbridge and Celbridge would benefit hugely from a public park at this location. The following policies from the Kildare County Development Plan 2017-2023 support this:

ECD 49: *Preserve the undeveloped sections of the Liffey Valley as a resource for tourism and to develop paths and walkways where appropriate, subject to environmental and other constraints and considerations.*

LV 1: *Progress the implementation of the flagship projects identified in the report Towards a Liffey Valley Park Strategy.*

LV 2: *Pursue the creation of a Liffey Valley Regional Park together with Fingal and South Dublin County Councils within the lifetime of the Plan.*



2. Crodaun Key Development Area

Recognising the need for housing in the town, Celbridge Community Council supports some development at the Crodaun KDA and feels that it is one of the better located of the KDAs with respect to public transport facilities. The Maynooth Road is serviced by the limited shuttle bus service to Hazelhatch train station and Louisa Bridge train station is an attractive option for many residents living to the north of Celbridge who can drive over to Leixlip as that rail line is better connected. The 67 Dublin Bus route serving Maynooth and Dublin also passes this KDA.

While the Crodaun KDA is sequentially furthest from Hazelhatch train station, Celbridge Community Council wishes to highlight that travel by bus makes a lot more sense for many people living in Celbridge due to one or more of the following reasons

- commuters' destinations being too far from the train line,
- unsuitable train times on the services that use the Phoenix Park tunnel,
- the prohibitory cost of paying for both parking and a train ticket,
- the shuttle bus service connecting some parts of the town with some services to / from Hazelhatch train station does not serve enough trains or areas of town
- the general difficulties encountered accessing Hazelhatch train station in a timely manner.

Unless the rail inter-connector project is revived, rail travel from Hazelhatch may continue to be less favoured to bus travel by many in Celbridge. Only the Ballyoulster and Crodaun KDAs are positioned on the 67 Dublin Bus route so these locations have an advantage over the other KDAs in terms of access to the most useful type of public transport.

Having said this, Celbridge Community Council is not supportive of the 600 residential units that are currently zoned by the Celbridge Local Area Plan 2017-2023 at Crodaun for the following reasons:

- material alteration 9 sacrificed a public park including playing pitches to achieve additional residential development to the detriment of enhancing the recreational lives of residents of Celbridge
- the proposal for additional houses immediately east of the roundabout risks damaging the visual impact on the approach to Celbridge from the M4. Any residential development here should be sympathetic to the beautifully landscaped approach with no housing visible from the approach to Celbridge on the R449
- exacerbation of traffic congestion on the Maynooth Road in light of
 - the extent of traffic congestion currently experienced on the Maynooth Road
 - new housing that is currently being built near Aldi
 - the fact that current residents of the town feel that a Western Link Road is already sorely lacking for the western side of the town without a single extra house being built but the only commitment to this in the Local Area Plan is objective MTO3.11, as follows:

"To explore by way of Feasibility Study the potential to construct a Western Link Road that will link Maynooth Road R405 with the Clane Road R403."

- the lack of provision for primary school facilities for families living in the new developments meaning that they will need to travel south and west to access primary schools for their children - the logical primary school for residents of the Crodaun KDA would be Scoil Mochua (Aghards) but this school is already oversubscribed with almost 700 pupils and enrolment policies whereby siblings of existing pupils are prioritised over proximity to the school mean that new residents will struggle to get places in it for their children. While we accept that the issues caused by over-subscription at schools is dynamic over time, Scoil Mochua is the only primary school north of the Shackleton Road and, assuming that an average of 12% of the population presents for primary education, the population increase from this development combined with smaller developments near Aldi would require at least 200 additional primary school places in the north of the town to avoid pushing car based primary school traffic to the west, center and south of the town.
- when Celbridge Community School relocates south of the river from its temporary site at Moortown, all secondary school girls will either be travelling west to St. Wolstan's Community College or south to Celbridge Community School in the Ballyoulster KDA or on the Hazelhatch Road



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Celbridge Community Council is in favour of a reduction in size of the Crodaun KDA so would support the Minister making a direction to replace some or all of the C zoning (New Residential) to the east of the junction of the R405 and R449 with F zoning (Open Space and Amenity).

We trust that the points raised by Celbridge Community Council will be taken into consideration in preparation of your report for the Minister.

Yours faithfully,

David Trost

Secretary

Celbridge Community Council