



14 June 2017

Planning Department,  
Kildare County Council,  
Aras Chill Dara,  
Devoy Park,  
Naas,  
Co. Kildare.

## **Submission on Material Alterations to Draft Celbridge Local Area Plan 2017-2023**

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 Material Alterations to the Draft Celbridge Local Area Plan 2017-2023.

In this submission, an analysis of key aspects of the Draft LAP is outlined before specific comments are made on the 53 material alterations. Some of our comments in relation to material alterations will refer back to the analysis that is presented at the start of the document for further context.

Celbridge Community Council wishes to promote the following themes in this submission:

- A. Restraint must be exercised in the rate of Celbridge's population growth in line with its designation as a "Moderate Sustainable Growth Town".
- B. At the current level of population, serious social infrastructure deficits are evident within Celbridge. Until they are redressed, the town cannot absorb additional population.
- C. Completion of an additional river crossing is essential in the near term. Until it is built, the town cannot support the increased vehicular traffic arising from a population increase.
- D. Completion of a ring-road is essential to divert traffic from pinch points in the road network.
- E. Restraint must be exercised in delivery of new residential development thereby ensuring that physical and social infrastructure provisioning occurs as a prerequisite for all future development.
- F. Given Celbridge's potential to develop into a primary tourism centre for the North East Kildare area, the preservation and promotion of culture and heritage needs to be paramount in planning decisions relating to the town. Consideration must be given to provision of facilities to support Celbridge in fulfilling its potential as a tourism hub.
- G. Strengthening of the town centre by provision of public amenities and supporting the enhancement of the retail offering would invigorate the local economy.
- H. Public transport connectivity between Celbridge and surrounding areas must be prioritised in order to support the economic development strategies outlined in the County Development Plan
- I. The economic development of Celbridge is critical for sustainable growth. Special attention must be focused on generation of employment opportunities in industries that support sectors including, but not limited to, tourism and the knowledge based economy.



## **2. Analysis of Key Aspects of the Draft Local Area Plan**

### **2.1 Transport Management Plan and Public Transport Strategy**

As a fast growing town that is already hindered by excessive traffic congestion and poor access to high quality public transport, Celbridge must be expanded in a strategic manner that addresses its existing issues and cannot be expanded in a “bolt on” manner. While Traffic and Transport Assessments commissioned by property developers to meet planning obligations have their role, developers will have a clear agenda which may result in downplaying of the impact that their development will have on the town so Celbridge Community Council fears that such assessments carried out on a development-by-development basis will not be strategic enough to give Celbridge the improvements that it desperately needs.

Celbridge Community Council is thus encouraged to see the material alterations pertaining to the preparation of a strategic Transport Management Plan and Public Transport Strategy for Celbridge. However, having observed how little was actually implemented from a transport plan that was previously prepared for Celbridge, we have real concerns about implementation of the recommendations from the strategic Transport Management Plan and seek to have dependencies on implementation of the plan included in the phasing of developments.

Celbridge Community Council strongly believes that a ring-road solution is required to alleviate traffic problems in Celbridge. This ring-road should make it possible for residents from all parts of the town to access Hazelhatch Train Station and the Dublin Road without being held up by local traffic, should be integrated with a new vehicular bridge and should not run through existing housing estates.

Celbridge Community Council would like to take this opportunity to offer our services to work together with Kildare County Council and transport agencies to progress a strategy that addresses the current issues and opens the way for further development in our town.

### **2.2 Key Development Areas**

#### **2.2.1 KDA 1 St. Raphael's**

With the removal of the Donaghcumper KDA (which we support), the St. Raphael's KDA remains the only town centre expansion site and accordingly, uses other than residential (retail, office, amenity and community uses) need to be adequately catered for.

Saint John of God's Trust hope to continue using facilities on this site on an ongoing basis for several more years for community and educational purposes and have concerns about the potential loss of facilities if the site is inappropriately redeveloped. Despite the longer term goal of moving clients to a community based setting, the need for a swimming pool and sports/ leisure facilities will always remain. Additionally, the existing swimming pool is heavily used for swimming lessons for the children of Celbridge.

Celbridge Community Council believes that strategies need to be devised and outlined for

- retention of a swimming pool at the St John of God's site to meet both the physiotherapy needs of St John of God's clients and swimming lessons for the children of Celbridge. This should be in the form of phased development at the site whereby the existing users of the swimming pool continue to be served whilst a more modern replacement swimming pool is provided to cater for existing uses plus some public sessions. Given the level of usage of the existing pool, Celbridge Community Council does not believe that the needs of both clients of St John of Gods and residents of Celbridge can be met by a North Kildare pool in Maynooth.
- safeguarding other leisure facilities for clients of St. John of God's either at the existing location or at an agreeable location elsewhere in Celbridge
- safeguarding residential accommodation for clients of St. John of God's who cannot live independently.



The overall site is 10.3 hectares and 9 hectares of this is proposed for residential housing. Material alterations to the Draft LAP propose that residential development be in the order of 180 dwelling units on 9 hectares. While the proposed density of 20 dwelling units per hectare could be considered low-medium and we accept that the number of units can only be determined at detailed design stage (and this may well be more than 100 dwelling units), Celbridge Community Council is concerned that non-residential uses crucial to the reinvigoration of the town centre will be abandoned in favour of residential development if there is an expectation that this KDA makes a more notable contribution to meeting targets for new dwellings in Celbridge.

On the basis that neither of the following appears to be addressed by the Draft Local Area Plan

- objectives or policies that address the poor pedestrian and cycle access to the St. Raphael's site from the Main Street (due to narrow footpath, lack of cycle lane etc.). This is surprising given the usage of the site by persons with disabilities.
- any connection between town centre development here and the potential traffic increase. While the quantity of housing to be provided here will be lower than in other KDAs, other uses of the site may result in significant changes to traffic patterns.

Celbridge Community Council believes that the challenges for this site need to be considered in detail by the proposed Transport Management Plan and that the following must be preconditions for development of this KDA:

- an upgrade of the road network in Celbridge including the provision of a new vehicular river crossing and a ring-road that diverts traffic around the town centre
- improvement of pedestrian and cycle access between the town centre and the Clane Road (possibly via the strategic open space in the lands of Celbridge Abbey)

There is a lot of concern in the community about the delivery of a new school for the children with special needs who currently attend the school in St. Raphael's. If, despite original intentions for its zoning as strategic open space, the site owned by St. John of God's near the river is deemed to be the best location for the school, then Celbridge Community Council will not object to this. It would have been nice to retain those lands in as close to their natural state as possible but some surety is needed and given the high importance of providing this new school, Celbridge Community would like to see a proactive approach being taken at this time to agreeing the best location for the school and for this to be reflected in the Local Area Plan. It is worth noting that there are concerns about the impact of a bridge being located alongside a school for children with complex special needs so this should be factored into the decision making. If another site, for example on a campus with another school, is agreeable to all parties then this might also be considered as there may be some scope for sharing facilities.

### **2.2.2 [old KDA 2] Donaghcumper**

Celbridge Community Council is in favour of removal of this area as a Key Development Area and preservation of this section of the Liffey Valley undeveloped as a resource for tourism and recreation. This is consistent with policies ECD 49, WC 6, LV 1 and LV 2 in the Kildare County Development Plan 2017-2023.



## 2.2.3 KDA 2 Ballyoulster

This KDA is well positioned with respect to accessing both Hazelhatch Train Station and existing bus routes but it is an “edge of town” development abutting onto an existing development of primarily bungalows in an area that suffers from notable social infrastructure and amenity space deficits. Integration of this KDA into the existing town in a manner whereby residents identify with Celbridge rather than Dublin will be an interesting challenge which we believe the Draft Local Area plan tried to address at one level with a dependency on a new pedestrian and cycle link from the Main St to the Dublin Road via the original KDA 2 Donaghcumper development.

- While we support the removal of the Donaghcumper KDA, the proposed removal of the pedestrian and cycle link will impact both residents of the Ballyoulster KDA and families accessing the new school(s). Celbridge Community Council is not convinced that proposed improvements for pedestrian and cycle traversal of the river alongside the existing vehicular bridge will be particularly attractive for residents of this KDA or for families travelling to the school(s) from north of the river and foresees both a significant rate of car dependency for traffic to the school(s) and a dependency by residents of this KDA on retail centres outside Celbridge such as Liffey Valley Shopping Centre.
- This part of town is poorly serviced with accessible open space/ amenity areas and the originally proposed access to open space alongside the river at Donaghcumper would have gone a long way towards redressing this deficit. Despite a proposed increase of 147 dwelling units for Ballyoulster KDA in the material alterations, no change is being proposed to the size of the local park envisaged. While the area of land allocated for a local park may be consistent with obligations for the provision of 15% open space within a development, Celbridge Community Council is concerned with the general inaccessibility of open space and active recreational facilities for residents of the wider south east area of town. With the lack of access to parklands alongside the River Liffey and the increased population envisaged for the Ballyoulster KDA, Celbridge Community Council feels that one of the following needs to be a prerequisite for the development in order to redress the issue:
  - the strategic open space along the River Liffey should be opened up for public usage, or
  - a public park should be included in this KDA to serve residents from the surrounding areas in addition to residents of the KDA
- Given the social infrastructure deficits in this area of town generally and the lack of zoned lands for anything other than residential and lack of a strategy for redress of deficits, Celbridge Community Council has concerns about the level of proposed population increase in this KDA. The proposed density of 30-35 dwelling units per hectare will also be out of character with the adjoining area.

## 2.2.4 KDA 3 Oldtown

Despite the rise of car based commuting that will ensue as a result of distance from the train stations, Celbridge Community Council understands that this KDA has been retained as the site is ready for development. Celbridge Community Council feels that this is the most poorly located of all the KDAs in terms of access to both public transport and the road network so welcomes the reduction in size of the KDA. The reduction in size will mitigate some of the effects that the development would have on the existing town but Celbridge Community Council still has the following concerns

- given the proposed removal of the Western Link Road objective, Celbridge Community Council fears that the development will exacerbate traffic congestion on both the Clane Road & Shackleton Road
- the originally proposed vision for this KDA envisaged the provision of neighbourhood parks for both passive and recreational activities and this would have gone some way towards redressing deficits in open space for active recreation in this part of town so there will be no amenity gains for the surrounding areas from the development of this KDA. While the proposed design may maximise the amount of residential development provided during the lifetime of this LAP, it will be at the expense of the future ability to provide an easily accessible neighbourhood park to serve residents from the western side of town as any future park will be set back further from the Shackleton Road.
- while the area of land proposed for local park / open space appears to be reasonable in the context of the proposed reduced size KDA, it is primarily located under overhead power lines so the usefulness of this for recreational purposes is questionable.



While acknowledging that the reduction in size of this KDA makes it hard to justify inclusion of the Western Link Road or a neighbourhood park, these are both things that current residents of the town feel are sorely lacking for the western side of the town without a single extra house being built.

Celbridge Community Council feels that commencement of construction of a new vehicular river crossing should be a prerequisite for any development at this site due to the negative impact that additional traffic will have on traffic from the western side of the town.

Celbridge Community Council also would be more enthusiastic about this development if the following conditions were met

- the proposed Transport Management Plan should prescribe prerequisites for development of this KDA in terms of changes to the road alignment close to the Shackleton and Oldtown Roads junction to facilitate school drop-offs for Scoil na Mainistreach thus alleviating traffic chaos on school mornings - recommendations could be made after examining the feasibility and benefit of measures such as providing designated drop-off / set down zones that do not hinder through traffic, a designated right turn lane for traffic from the Clane side turning onto Church Road or altering the road alignment to facilitate “jug handle”/ hook turns, how public transport might be used to reduce car dependency for school children and how the road alignment might best facilitate a useful bus route in this area
- provision be made for active recreation facilities and either
  - the proposed park running from the power lines at the south west towards the site for the school at the north east be retained as per the original design concept rather than changing the use to residential, or
  - the power lines be undergrounded thereby ensuring that the open space along the south west of the KDA is a pleasant space for recreation
- if the Western Link Road is not going to happen in the lifetime of this KDA, the section of the route that was due to pass through the original larger Oldtown KDA should still be constructed in order to minimise the number of entry/exit off the Shackleton Road to the KDA and the remainder of the route should be safeguarded from other development as a potential transport corridor

## **2.2.5 KDA 4 Crodaun**

Despite concerns raised regarding development on this scale at the northern periphery of the town and the rise of car based commuting that will ensue as a result of distance from the train station, Celbridge Community Council understands that this KDA has been retained as the site is ready for development and, despite it's distance from train stations, it is located on a public transport route (67 Dublin Bus).

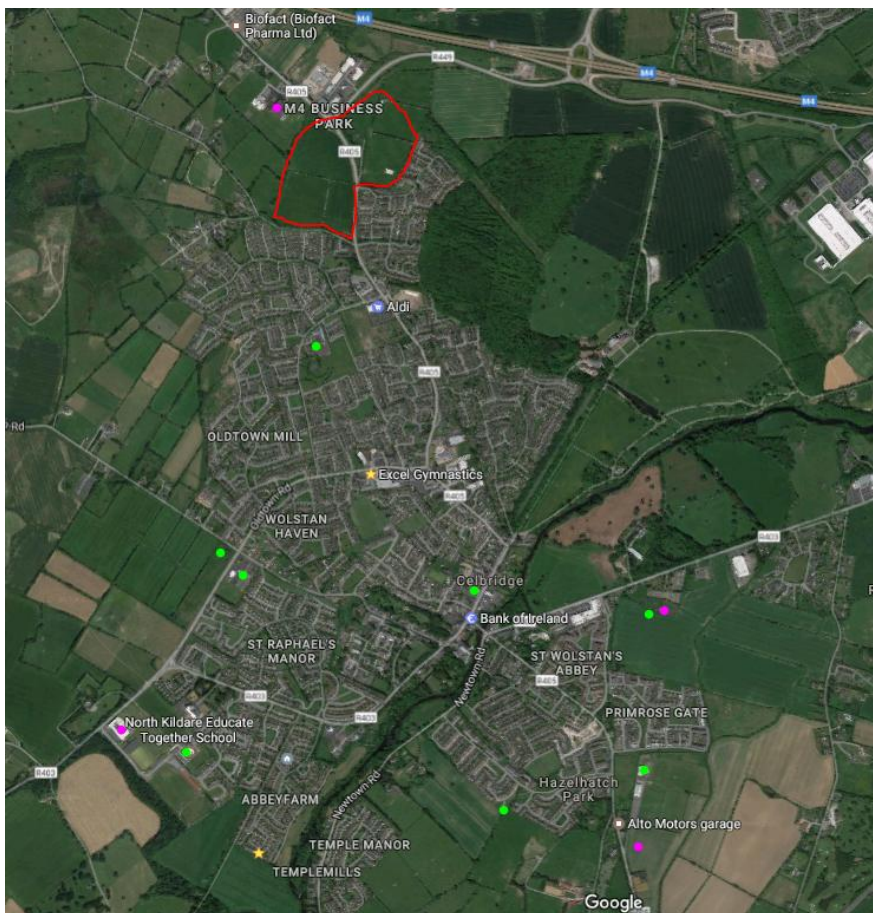
Celbridge Community Council considers this KDA to be well positioned in terms of access to the road network and reasonably well catered for by public transport but has concerns relating to exacerbation of traffic congestion on the Maynooth Road in light of the proposed removal of the Western Link Road objective. The congestion problem extends beyond commuting - it's not as simple as saying that residents of this KDA just need to “slip out” onto the M4 for their commute. Many families dropping children to school will be driving towards the town or west towards Scoil na Mainistreach, NKETNS and St Wolstan's Community School.

- all primary school traffic will need to travel south or west as there is no proposal for a new primary school site to the north 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 so only secondary school boys will have a school that is easily accessible from this KDA



While the logical primary school for residents of the Crodaun KDA would be Scoil Mochua (Aghards), this school is already oversubscribed with almost 700 pupils and enrollment policies whereby siblings of existing pupils are prioritised over proximity to the school mean that many new residents in this KDA would need to travel further south or west to get to their schools. While we accept that the issues caused by oversubscription 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.

Celbridge Community Council feels that provision of primary school places for children at this KDA needs to be made a priority either through extension of Scoil Mochua (not sure if there is much scope for that as it has already been expanded on a few occasions) or provision of a new site to the north of town. The extent of this problem for the north of town is clearly illustrated in the following map where all primary school locations (existing and possible future locations) are shown in green and secondary school locations (existing and possible future locations) are shown in pink:



The material alterations to the Draft LAP seek to redirect an area of land at the north east of the site for this KDA that was originally envisaged for a public park (including playing pitches) to be used for residential purposes thereby increasing the number of dwellings from 450 to 600 at this KDA. Celbridge Community Council is concerned with the proposed changes to the design concept and feels that this KDA can be scaled back as part of the reduction to be consistent with the 10% of County Kildare target that is allocated to Celbridge.



The following points should be considered in relation to the proposed material alterations for this KDA:

- the proposal to relocate open space to the north east positions it
  - in a less favourable location further from the Maynooth Road and therefore less easily accessible on foot, by bicycle or by public transport
  - closer to the noise of the M4 motorway and odour emanating from the civic amenity / recycling centre that is proposed for a site adjacent to the M4 interchange thereby threatening the quality of the amenity.
- the sacrifice of a public park including playing pitches to achieve additional residential development does nothing to enhance 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 - retain mound and trees, set back a good distance from road, include plenty of open space etc.(i.e. don't use all of the 4.9 hectares for new residential)
- high density in this KDA will be out of character with bungalows in the existing Crodaun Forest Park residential area

## 2.2.6 KDA 5 Simmonstown

The proposed threefold increase in the number of dwellings to be provided at this KDA from 393 to 1225 (increase of 832) represents a dramatic response to the Department of the Environment, Community and Local Government's request that zoning for residential development be switched from the north to south side of Celbridge to capitalise on the extent of existing public transport infrastructure with a particular focus on provision of housing in the vicinity of Hazelhatch Train Station. The Department's submission clearly identified lands to the east of the Hazelhatch Road and lands at Simmonstown Stud as being strategically positioned between the existing built form of the town and the train station at Hazelhatch.

Celbridge Community Council is concerned about a number of aspects of this KDA as follows:

- the scale is excessive in a very poorly serviced area of town - at 2257 dwelling units, the combined increase in dwellings south of the river from this KDA and the Ballyoulster KDA will double the number of dwellings on this side of town. The experience of residents to the south of the river in Celbridge is that non-profit aspects of new development have not been delivered in a timely fashion if at all so they have no confidence that such aspects will be delivered for any new developments either. The deficits in services, amenities and infrastructure within the existing built form on this side of the river are significant - for example
  - there are regular problems relating to sewerage smells,
  - there are no parks or playgrounds and few services / amenities / recreational facilities for children or teenagers with the result that anti-social behaviour is an issue
  - St. Patrick's primary school has been housed in temporary accommodation for 10 years,
  - there is still no secondary school on this side of the river as Celbridge Community School was forced to open on temporary accommodation at Moortown,
  - pressure on childcare is high resulting in parents having to source childcare outside of the town or leave children in the care of minders that they are not fully happy with
- while development on Simmonstown Stud lands will be quite close to Hazelhatch Train Station, the furthest reaches of this KDA would be 2.5km away from the train station and 1.75km from the town centre and Dublin Bus / Bus Eireann transport routes. The train line through Hazelhatch is only useful to some commuters so bus transport routes will remain crucial for connectivity from Celbridge to colleges and workplaces at destinations that are neither close to nor can be accessed from connection points on the Kildare rail line. Bus transport has the potential to become an increasingly attractive transport option with roll out of the Bus Connects programme.
- the proposed density of 35 dwelling units per hectare is out of character with the existing estates in the surrounding area and such density is particularly hard to justify at the furthest reaches of this KDA which are poorly connected to public transport



- the prospect that the extra volume of traffic caused by the new KDA and / or a new vehicular river crossing will be diverted through Hazelhatch Park / Callender's Mill / Simmonstown Manor thereby
  - endangering the safety and lives of children playing in these estates
  - rendering open space on which children currently play unusable by virtue of a busy road passing through the open space
- the prospect that families accessing the proposed new school in this KDA will use Hazelhatch Park / Callender's Mill as an "unofficial car park"

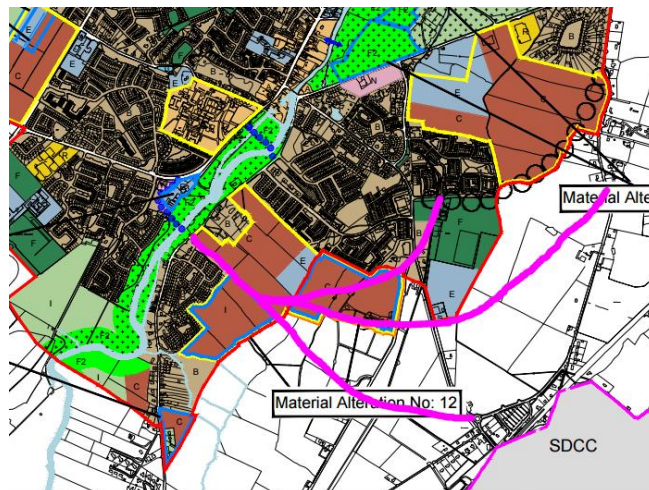
Celbridge Community Council is not against this development but feels that it needs to be extremely carefully executed in order to address the very real concerns voiced by the existing population. Given the magnitude of the proposed new development, Celbridge Community Council agrees that

- development here must be dependent on the delivery of a new vehicular bridge, and
- a Masterplan is crucial before any work can be undertaken on this KDA

However, Celbridge Community Council requests that the LAP clearly defines the process for preparation and approval of the masterplan including a commitment to it being subject to public consultation and, more importantly, public approval.

Celbridge Community Council feels that development of this KDA should additionally be contingent on

- construction of a ring road that directs traffic alongside rather than through existing residential developments - possible alternative routes are explored in pink in the map below:



- construction of sufficient approach routes to the new school and adequate drop-off facilities to ensure that residents of Callenders Mill or Hazelhatch Park are not negatively impacted by use of areas outside their homes as an "unofficial car park"
- protection of the cul de sacs at Callenders Mill, Hazelhatch Park and Simmonstown Manor from being opened up into this KDA to avoid a rat run which would diminish quality of life for existing residents
- the power lines through public open space being undergrounded thereby ensuring that the open space is a pleasant space for recreation
- the 15% open space provision being both aesthetically pleasing and usable by children for recreation and not just patches of green that are unsightly due to overhead power lines or unsafe due to the road network
- provision of parks that include facilities for active recreation for all ages - definition of what is expected of developers needs to be much clearer to ensure that active recreational facilities are actually provided and that they are of a nature that will contribute towards diversion of time spent engaging in anti-social behaviours to more acceptable activities
- rectification of existing infrastructural deficits before loading the area with more housing





In relation to the proposed scale of this KDA

- the material alterations propose extending this KDA eastwards into lands at Simmonstown Stud but also westwards behind Temple Manor with an additional 832 dwelling units.
- given how the landowners at Simmonstown Stud are amenable to the extension onto their lands and the suitable location of their lands relative to Hazelhatch Train Station, Celbridge Community Council supports this part of the amendment
- Celbridge Community Council is less happy with the extension westwards on account of distance from public transport and the town centre and sees this as an area of zoning that could be discarded as part of the reduction to be consistent with the 10% of County Kildare target that is allocated to Celbridge



## Material Alterations

### Chapter 1 Introduction

#### **Material Alteration 1**

Celbridge Community Council welcomes this alteration.

### Chapter 3 Vision for Celbridge

#### **Material Alteration 2**

Celbridge Community Council welcomes this positive alteration to the Strategic Vision and thanks Kildare County Council for considering our proposal in this respect.

### Chapter 4 Compliance with Core Strategy

#### **Material Alteration 3**

Celbridge Community Council feels that the estimate of 4033 new dwelling units is excessive given Celbridge's designation as a "Moderate Sustainable Growth Town" and the existing infrastructural deficits that are evident in the town. 4033 dwelling units is equivalent to 12.41% of the 32497 new dwellings targeted for Co. Kildare as a whole but the County Development Plan limits the percentage of the county's target that is to be accommodated in Celbridge at 3250 (10%).

Accordingly, Celbridge Community Council requests that Kildare County Council scale back the number of new dwellings to 3250 to be consistent with the settlement aims of the Core Strategy as specified in the Kildare County Development Plan 2017-2023.

This point will be elaborated on further in our comments regarding Material Alteration 5.

#### **Material Alteration 4**

Celbridge Community Council welcomes this alteration in principal but requests that the proposed alteration be improved to outline the legal basis of a Transport Management Plan, the process for preparing one, the weight that will be attributed to the Transport Management Plan and the timeframe in which it should be prepared. We suggest that a target date early in 2019 be specified and request that a commitment be made here to the Transport Management Plan being open to public consultation. Additionally, the text stating "that KDA 5 Simmonstown be dependent on the delivery of the new vehicular bridge"

should be extended to include

"and a ring road that directs traffic alongside rather than through existing residential developments".

With the extent of housing growth projected for the metropolitan region, and specifically for Celbridge, it will be imperative to plan ahead regarding transport needs for the town. Celbridge Community Council would be happy to work together with Kildare County Council as required.



## **Material Alteration 5**

As an extension of Celbridge Community Council's request above (#3) that the number of new dwellings be scaled back to 3250 to be consistent with the settlement aims of the County Development Plan's Core Strategy, the following are suggested areas for achieving the 783 reduction in numbers:

- **KDA 1 St. Raphael's** - Celbridge Community Council is not in favour of increasing the number of dwelling units in this KDA from 100 to 180 as explained in our comments above regarding the importance of non-residential uses (retail, office, amenity and community uses including ongoing use of this site by Saint John of God Trust for community and educational purposes) for this KDA.  
**Recommendation:** Reduce by **80**
- **KDA 2 Ballyoulster** - Celbridge Community Council urges restraint in the number of dwellings to be delivered at this site until measures can be taken to redress deficits in access to useable open space and social infrastructure as outlined in our comments above regarding this KDA.  
**Recommendation:** Reduce by **100**
- **KDA 3 Oldtown** - Celbridge Community Council feels that the scale of development at this site could be further reduced until deficits in transport infrastructure are rectified and a neighbourhood park with active recreation facilities is provided in this area of town as explained in our comments regarding this KDA above.  
**Recommendation:** Reduce by **120**
- **KDA 4 Crodaun** - Celbridge Community Council is concerned with the scale of this KDA in light of the proposed removal of the Western Link Road objective and is not in favour of sacrificing a public park with active recreation facilities in this area of town in favour of increasing the number of dwelling units as explained in our comments regarding this KDA above  
**Recommendation:** Reduce by **130**
- **KDA 5 Simmonstown** - Celbridge Community Council feels that the area of lands proposed for residential development to the southwest of this site should be omitted due to distance from both public transport and the town centre as explained in our comments regarding this KDA above  
**Recommendation:** Reduce by **270**
- Reduction in numbers of dwellings on non-KDA sites particularly where such development results in the town sprawling in a linear fashion that eats into the surrounding green belt  
**Recommendation:** Reduce by **80**

## **Material Alteration 7**

Celbridge Community Council wishes to make the following observations on the proposed Core Strategy Map:

- the lands at the west of the Simmonstown KDA that Celbridge Community Council opposes are not included in this map so we agree with the area of land laid out for the Simmonstown KDA
- if the increase from 450 to 600 dwelling units at Crodaun KDA does proceed, the "extra" proposed area for open space to the north east (that we feel is poorly positioned) is not shown on this map but should be included in lands for the KDA as delivery of public open space needs to be a prerequisite.

## **Material Alteration 8**

Celbridge Community Council welcomes this alteration to rezone lands at Donaghcumper from A - Town Centre to F2 - Strategic Open Space and consequential amendments needed to remove this KDA from scope for the reasons explained in our comments regarding this originally proposed KDA above.

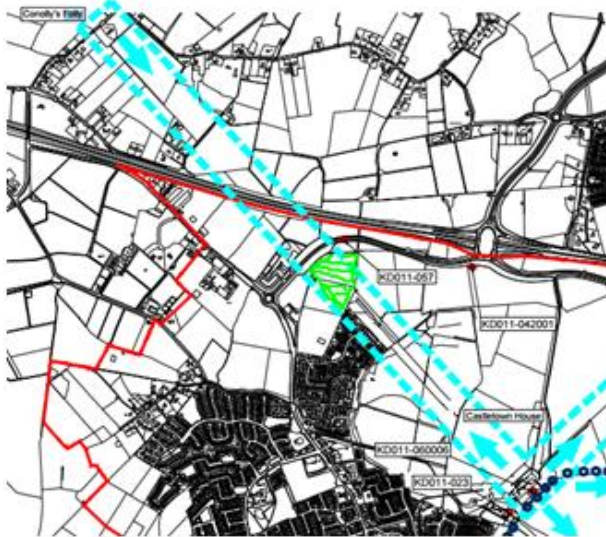
## **Material Alteration 9**

Celbridge Community Council does not agree with the sacrifice of a public park including playing pitches to achieve additional residential development for the reasons stated in our comments regarding the Crodaun KDA above.



## Material Alteration 10

Celbridge Community Council neither agrees with the proposal to locate a park here for the reasons stated in our comments regarding the Crodaun KDA above nor sees any benefit from the proposed rezoning from 'G' Green Belt to 'F' Open Space as most of the lands proposed from 'G' to 'F' are protected from development due to the protected view from the back of Castletown House to Conolly's Folly. See map with view line (based on map 10.1 in Draft LAP) with the area subject to material alteration no. 10 marked in green.



Since the only difference between uses permitted on "F" versus "G" is that "F" permits **Community, recreational and sports buildings** and, while theoretically these might be a good thing, with the protected view line there appears to be no point in this re-zoning. "G" zoning allows for parks, playgrounds and playing fields so, unless there's a plan for a community, recreational or sports building in the tiny corner that is not within the protected view line, then rezoning to "F" has no material benefit.

## Material Alteration 11

Celbridge Community Council feels that this is the most poorly located of all the KDAs in terms of access to both public transport and the road network so welcomes the reduction in size of the KDA but still has concerns particularly in relation to the provision of useable and aesthetic open space. Our concern relating to open space may not affect the area to be zoned but we feel that residential development should be scaled back further at this KDA possibly by the retention of the full sized public park that was originally envisaged between the site for the school and the power lines - the material alterations propose housing for 2/3 of the space originally allocated for a public park. Our thoughts on this are explained in our comments relating to the Oldtown KDA above.

## Material Alteration 12

Celbridge Community Council feels that the proposed scale of this development is excessive and that the sprawl westwards in particular will result in increased car dependency as this part of the development is too far from public transport and the town centre. Celbridge Community Council sees the western portion of the proposed KDA as an area that should retain 'I' Agricultural zoning but is in agreement with the change of zoning to 'C' New Residential on the lands within Simmonstown Stud. A reduction in size here can easily be accommodated as part of the housing target reduction to be consistent with the 10% of County Kildare target that is allocated to Celbridge. Our thoughts on this are explained in our comments relating to the Simmonstown KDA above.



## **Material Alteration 13**

Celbridge Community Council disagrees with this zoning on the basis that it will result in sprawl of the town. This location is approximately 750m beyond the "Welcome to Celbridge" signpost located on the Maynooth Road, thereby eating into the greenbelt between Celbridge & Maynooth (and conflicting with Material Alteration #40).

While this location is on a Dublin Bus route (6 mins with no traffic from Salesians to Main St and another 5 or more minutes walking time to get to that bus stop), it's proposed usage for c.30 executive homes on a 5.4ha site indicates that the residents will most likely be car dependent. This contravenes the

*"Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares."*

principle for greenfield sites from the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and it would be preferred if this site was preserved for a higher density housing development in the future at such a time as Celbridge town extends in this direction in a sustainable manner.

## **Material Alteration 14**

Celbridge Community Council objects to this alteration as we share the views expressed in the Chief Executive's report that

*"The subject lands are considered to be relatively peripheral to the settlement and to the rail node at Hazelhatch based on the current transport network. It is considered that there are adequate lands for residential development, which are sequentially closer to the town centre, closer to public transport nodes and more suitable for residential development."*

## **Material Alteration 15**

While not ideal that land that was originally envisaged as "Strategic Open Space" would be redirected to usage as a school, this site is set back a bit from the river and the rezoning proposed by this alteration shouldn't jeopardise the strategic goals of environmental protection or facilitation of a Liffey Valley Park with greenways etc. The main problems that this rezoning may give rise to relate to provision of a new vehicular bridge crossing if a decision is made to opt for the option that runs adjacent to this site - the road layout approaching the bridge would be pretty awkward.

Celbridge Community Council don't strongly feel the need to object on this rezoning as St John of God's should be supported in the challenges it faces with retaining the level of services that it currently provides to the community.

## **Material Alteration 16**

Celbridge Community Council would prefer to see this new roads objective retained as current residents of the town feel this is sorely lacking for the western side of the town without a single extra house being built but accepts that a Western Link Road would be a significant infrastructural project and that the additional river crossing must be prioritised over it. If this objective is to be removed at this time, we would like to see the route safeguarded from other development as a potential transport corridor when development on the scale originally envisaged for the Oldtown KDA comes back into scope.

Celbridge Community Council believes that a true ring-road solution is required to alleviate traffic problems in Celbridge. This ring-road should make it possible for residents from all parts of the town to access Hazelhatch Train Station and the Dublin Road without being held up by local traffic, should be integrated with a new vehicular bridge and should not run through existing housing estates.

Celbridge Community Council has a number of concerns about traffic flow particularly during morning and evening rush times and if this new roads objective is removed then solutions for alleviating these problems need to be identified by the proposed Transport Management Plan and implementation of these solutions need to become prerequisites for development at both the Oldtown and Crodaun KDAs.



## Chapter 5 Urban Centres & Retailing

### **Material Alteration 17**

Celbridge Community Council welcomes this alteration to remove the originally proposed Donaghcumper KDA from the Figure 5.1 Town Centre Expansion Map.

### **Material Alteration 18**

Celbridge Community Council welcomes this alteration.

## Chapter 6 Housing & Community

### **Material Alteration 19**

Celbridge Community Council welcomes this alteration.

### **Material Alteration 20**

Celbridge Community Council acknowledges that this alteration came indirectly from a rewording that we suggested which was to change from

*RDO1.4: To focus **the majority of** new housing in Celbridge within walking or cycling distance of a school cluster, **the town centre or** transport routes.*

to

*RDO1.4: To focus **all** new housing in Celbridge within walking or cycling distance of a school cluster, transport routes **and either the town centre or a neighbourhood centre.***

This suggestion was motivated by the desire to limit car dependency and our suggested wording called out

- schools,
- transport routes and
- town/ neighbourhood centres

as distinct items all of which should be within walking or cycling distance of new developments.

Celbridge Community Council feels that the wording put forward in the proposed amendment implies that it's acceptable for a proposed development to be close to only one of the three so we feel that the wording should be tightened up to encourage proximity to all 3 of schools, transport routes and the town centre or a neighbourhood centre.

### **Material Alteration 21**

Celbridge Community Council welcomes this alteration.

## Chapter 7 Economic Development

### **Material Alteration 22**

Celbridge Community Council welcomes this alteration though feels that the wording and/or punctuation could be improved to make it read better.

### **Material Alteration 23**

Celbridge Community Council welcomes this positive alteration which will hopefully make the trails within Celbridge Abbey and passage over the Rock Bridge possible for pedestrians and cyclists. Our motivation in proposing this new objective was to encourage movement that is not dependent on car usage including the provision of an alternative route for pedestrians wishing to avoid the narrow footpath on the Clane Road at Celbridge Abbey where 2 buggies/ wheelchairs cannot pass without one going down off the footpath onto the road.



## **Material Alteration 24**

Celbridge Community Council welcomes this alteration.

## **Chapter 8 Movement & Transport**

### **Material Alteration 25**

Celbridge Community Council welcomes any alteration that will improve routes for pedestrians and cyclists but highlights the fact that there are currently no dedicated cycle facilities over the River Liffey! Celbridge Community Council would be delighted to see a non-vehicular bridge to provide a safer route.

### **Material Alteration 26**

Celbridge Community Council welcomes this alteration.

### **Material Alteration 27**

Celbridge Community Council welcomes this alteration, and suggest that the objective is enhanced as follows:

*“To promote enhanced permeability for pedestrians and cyclists within the urban environment in order to improve access to local shops, schools, public transport services and other amenities, subject to local public consultation and agreement in accordance with NTA published ‘Permeability: Best Practice Guide (2015)’, or any successor to same.”*

### **Material Alteration 28**

Celbridge Community Council welcomes this alteration in theory but feels that a stronger commitment should be made by setting a goal to make Celbridge fully accessible within the lifetime of the Local Area Plan working in partnership with Celbridge Access Group (rather than to just “engage” with them).

### **Material Alteration 29**

Celbridge Community Council welcomes this alteration, but suggests that the objective is enhanced as follows:

*“To engage with the NTA, Dublin Bus, Irish Rail, Local Link and all other stakeholders, including representatives from the local community, to improve the provision of public transport in Celbridge.”*

### **Material Alteration 30**

Celbridge Community Council welcomes this alteration as the peace of mind of having secure bicycle storage at Hazelhatch Train Station should encourage more use of the train for commuters..

### **Material Alteration 32**

Celbridge Community Councils believe that this alteration would benefit from the removal of the reference to KDAs as development proposals other than the KDAs might be considered to be significant development proposals - i.e. change as follows:

*“To ensure that all significant development proposals ~~for the KDAs~~ are subject to a Traffic Impact Assessment (TIA), to be carried out in accordance with the Traffic and Transport Assessment Guidelines, NRA (2014). The requirement for TIA will be determined, by the Planning Authority, on a case-by-case basis. Each TIA should be added to the existing Transport Management Plan for Celbridge.”*

The inclusion of a definition of what is deemed to constitute a significant development proposal would also improve this objective.

### **Material Alteration 33**

Celbridge Community Council welcomes this alteration.



## **Material Alteration 34**

As stated previously in our comments regarding material alteration #16, Celbridge Community Council would prefer to see this new roads objective retained as current residents of the town feel this is sorely lacking for the western side of the town without a single extra house being built but accepts that a Western Link Road would be a significant infrastructural project and that the additional river crossing must be prioritised over it.

If the Western Link Road is not going to be built during the lifetime of this Local Area Plan then, instead of removing objective MTO3.9, it should be changed to cover protection of the route from development as there is a strong chance that this is transport infrastructure that will be needed in the longer term (when development at the site of the originally planned Oldtown KDA can be done in a more sustainable manner).

Celbridge Community Council has a number of concerns about traffic flow particularly during morning and evening rush times and if this new roads objective is removed then solutions for alleviating these problems need to be identified by the proposed Transport Management Plan and implementation of these solutions need to become prerequisites for development at both the Oldtown and Crodaun KDAs. The re-wording of the objective should make reference to taking actions to alleviate traffic congestion to the north and west of the town based on recommendations arising from the Transport Management Plan.

## **Material Alteration 35**

Celbridge Community Council welcomes this alteration, and suggests that the objective is enhanced to put a timeframe on the preparation of the Transport Plan/ Strategy and to actively include representation from the community as follows:

*“To prepare, before 2019, a Transport Management Plan and Public Transport Strategy for Celbridge to support the sustainable growth and development of the town and to identify strategic connections for pedestrian, cyclist, bus and vehicle movement in consultation with statutory agencies and key stakeholders, including representatives from the local community.”*

## **Material Alteration 36**

Celbridge Community Council welcomes this alteration.

## **Chapter 10 Built & Natural Heritage**

### **Material Alteration 38**

Celbridge Community Council welcomes this alteration.

## **Chapter 11 Green Infrastructure & Strategic Open Spaces**

### **Material Alteration 39**

Celbridge Community Council welcomes this alteration.

### **Material Alteration 40**

Celbridge Community Council welcomes this alteration, and suggest that the objective is enhanced as follows:

*“Amend objective OSO1.6 as follows: To maintain and protect, from inappropriate development, the greenbelt between Leixlip, Celbridge and Maynooth. [This greenbelt is shown on Map XX](#)”*

Celbridge Community Council would like clarification to be provided in map format regarding which areas constitute the greenbelt around all sides of the town, in order to provide clarity to all stakeholders.





## Chapter 12 Urban Design & Key Development Areas

### **Material Alteration 42**

Celbridge Community Council welcomes this alteration but feels that a swimming pool absolutely has to be retained to meet the physiotherapy needs of St John of God's clients and swimming lessons for the children of Celbridge. The masterplan needs to have a phased strategy for retention of the existing swimming pool to serve existing uses whilst a more modern one is provided for these uses plus some public sessions.

Celbridge Community Council suggests that a separate objective be added for the facilities that need to be retained on site (including the swimming pool) as follows:

The Masterplan shall outline a strategy for safeguarding leisure facilities and residential accommodation for residents who cannot live independently and for retention of the existing swimming pool to continue serving both the needs of St John of God's clients and swimming lessons for children until such a time as a more modern replacement can be provided

and the proposed objective be changed as follows:

"The Masterplan shall investigate the feasibility of providing a **new** swimming pool, 10% of housing specifically designed for older people, a women's refuge to serve North Kildare, community/ recreational/ cultural facilities for younger and older people."

Additionally, Celbridge Community Council requests that section 12.2.1 clearly defines the process for preparation and approval of the masterplan including a commitment to it being subject to public consultation and, more importantly, public approval.

### **Material Alteration 43**

Celbridge Community Council agrees with the change to Map 12.1 relating to the Donaghcumper KDA but we have concerns relating to the Oldtown and Simmonstown KDAs which need to be considered here.

Our concern relating to open space in the Oldtown KDA may not affect the area shown on this map but we feel that residential development should be scaled back further at this KDA possibly by the retention of the full sized public park that was originally envisaged between the site for the school and the power lines - the material alterations propose housing for  $\frac{2}{3}$  of the space originally allocated for a public park. Our thoughts on this are explained in our comments on material alteration #11 and our comments relating to the Oldtown KDA above.

Celbridge Community Council indicated in our comments on material alteration # 12 above that the western portion of the proposed Simmonstown KDA should retain 'I' Agricultural zoning but that we are in agreement with the change of zoning to 'C' New Residential on the lands within Simmonstown Stud.

### **Material Alteration 44**

Celbridge Community Council has the following observations on proposed changes to the design concept for the Ballyoulster KDA:

- given our concerns relating to provision of public open space that is accessible for residents of the south east of town and the proposed expansion of the "Residential area", Celbridge Community Council feels that consideration needs to be given to the provisioning of public open space and this may affect this design concept
- consideration should be given to whether the entrance/ exit for the site on the Dublin Road is essential
- it is unclear what the future plans are for provision of graveyard facilities so questions the decrease in graveyard expansion space



## **Material Alteration 45**

Celbridge Community Council would like this design concept to

- address traffic issues relating to school drop-offs and pick-ups around the the Shackleton Road and Oldtown Road junction with provision for changed road alignments
- provide adequately for useable and aesthetic open space to include active recreation facilities
- address retention of a road parallel to the Shackleton Road as the start of a future Western Link Road as the number of entry/exit points off the Shackleton Road to the KDA should be minimised

Our thoughts on this are explained in our comments on material alteration #11 and our comments relating to the Oldtown KDA above.

## **Material Alteration 46**

Celbridge Community Council is concerned with the scale of this KDA in light of the proposed removal of the Western Link Road objective and is not in favour of sacrificing a public park with active recreation facilities in this area of town in favour of increasing the number of dwelling units as explained in our comments regarding the Crodaun KDA above.

## **Material Alteration 47**

Celbridge Community Council supports the text which states that the Simmonstown KDA will be subject to a Masterplan but requests that the LAP clearly defines the process for preparation and approval of the Masterplan including a commitment to it being subject to public consultation and, more importantly, public approval. The concerns outlined in our comments relating to the Simmonstown KDA above include

- a retention of 'I' Agricultural on lands to the west of the KDA (behind Temple Manor)
- the usability and aesthetics of open space where power lines pass overhead
- roads and permeability

and would give rise to changes to the design concept for the Simmonstown KDA.

In relation to the proposed scale of this KDA

- the material alterations propose extending this KDA eastwards into lands at Simmonstown Stud but also westwards behind Temple Manor with an additional 832 dwelling units.
- given how the landowners at Simmonstown Stud are amenable to the extension onto their lands and the suitable location of their lands relative to Hazelhatch Train Station, Celbridge Community Council supports this part of the amendment
- Celbridge Community Council is less happy with the extension westwards on account of distance from public transport and the town centre and sees this as an area of zoning that could be discarded as part of the reduction to be consistent with the 10% of County Kildare target that is allocated to Celbridge

In relation to requirement #1 that should be met by the Masterplan, Celbridge Community Council believes that the following should be expanded on as follows:

“... This strategy will be informed by a detailed traffic assessment to ascertain the extent of development that could be supported by particular upgrading works [and will respect safety concerns of existing residents regarding the preservation of cul de sacs at Callenders Mill, Hazelhatch Park and Simmonstown Manor](#)”

In relation to the “Connectivity / Movement” text, Celbridge Community Council disagrees with the proposed link road from Hazelhatch Park (erroneously described in text as “via Callenders Mill”) and requests that this be amended to achieve access to the KDA from roads outside of established residential areas. Celbridge Community Council is also concerned about the prospect that families will use Hazelhatch Park / Callender’s Mill as an “unofficial car park” when accessing the proposed new school as explained in our comments on the Simmonstown KDA above so again requests that a solution be devised outside of existing residential areas.



## **Chapter 13 Implementation**

### **Material Alteration 50**

Celbridge Community Council disagrees with changes proposed by the alteration as follows:

- Given the difficulties experienced by parents locating suitable childcare, Celbridge Community Council does not support the change to delay pro-rata provision of childcare.
- Given the poor provision of useable open space in this area of town, Celbridge Community Council does not support the change to delay the completion of the park.

Celbridge Community Council believes that improved pedestrian & cycle facilities (including the completion of a footpath on the southern side of the Lucan Road) should be outlined at this stage.

### **Material Alteration 51**

Celbridge Community Council disagrees with changes proposed by the alteration as follows:

- Given the difficulties experienced by parents locating suitable childcare, Celbridge Community Council does not support the change to delay pro-rata provision of childcare.
- Given the poor provision of useable open space in this area of town, Celbridge Community Council does not support the removal of the park.

Also, as previously stated, Celbridge Community Council would prefer if the Western Link Road was retained as part of a true ring-road solution is required to alleviate traffic problems in Celbridge. This ring-road should make it possible for residents from all parts of the town to access Hazelhatch Train Station and the Dublin Road without being held up by local traffic, should be integrated with a new vehicular bridge and should not run through existing housing estates. Therefore, we do not support the removal of the Western Link Road

Celbridge Community Council believes that the Oldtown KDA should be dependent on the provision of a new vehicular bridge especially if the Western Link Road is abandoned so requests the insertion of this dependency as an item in this table.

Celbridge Community Council requests that completion of a proper strategic Transport Management Plan and implementation of its recommendations as they pertain to this KDA be inserted as an item in this table. See our comments regarding the need for a strategic approach to transport management earlier in this submission.

### **Material Alteration 52**

Celbridge Community Council disagrees with changes proposed by the alteration as follows:

- Given the difficulties experienced by parents locating suitable childcare, Celbridge Community Council does not support the change to delay pro-rata provision of childcare.
- Given the poor provision of useable open space in this area of town, Celbridge Community Council does not support the removal of the park.

Celbridge Community Council requests that completion of a proper strategic Transport Management Plan and implementation of its recommendations as they pertain to this KDA be inserted as an item in this table. See our comments regarding the need for a strategic approach to transport management earlier in this submission.



**Material Alteration 53**

Celbridge Community Council disagrees with changes proposed by the alteration as follows:

- Given the difficulties experienced by parents locating suitable childcare, Celbridge Community Council does not support the change to delay pro-rata provision of childcare.
- Given the poor provision of useable open space in this area of town, Celbridge Community Council does not support the change to delay the completion of the park.

Celbridge Community Council requests that the text regarding provision of a “River Liffey Vehicular Bridge and link road” prior to the commencement of any development be amended to state ring-road instead of link road as explained in our comments relating to the Simmonstown KDA above.

Celbridge Community Council requests that completion of a proper strategic Transport Management Plan and implementation of its recommendations as they pertain to this KDA be inserted as an item in this table. See our comments regarding the need for a strategic approach to transport management earlier in this submission.

We trust that the points raised by Celbridge Community Council will be taken into consideration in finalising the Celbridge Local Area Plan 2017-2023.

Yours faithfully,

**David Trost**

**Secretary**

**Celbridge Community Council**