



13 July 2016

Celbridge Community Council
Submission on Draft Kildare County Development 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 in Celbridge and to influence in a positive way the physical development of Celbridge 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 Kildare County Development Plan 2017-2023.

In this submission, comments will be grouped under headings for various chapters of the Draft County Development Plan in support of the following themes that Celbridge Community Council wishes to promote for the Celbridge area:

- A. Restraint must be exercised in the rate of population growth within the town in line with Celbridge's designation as a "Moderate Sustainable Growth Town".
- B. Given Celbridge's potential to develop into a primary tourism centre in the North East Kildare area, the preservation and promotion of Celbridge's heritage needs to be paramount in planning decisions made relating to the town. Consideration must to be given to provision of facilities to support Celbridge in fulfilling its potential as a tourism hub.
- C. At the current level of population, serious social infrastructure deficits are evident within Celbridge. Until they are redressed, the town cannot absorb additional population.
- D. Completion of an additional river crossing is essential in the near term. Until it is built, the town cannot absorb additional population.
- E. Strengthening of Celbridge's town centre by provision of public amenities and enhancing the retail offering would invigorate the local economy.
- F. Transport connectivity between Celbridge and surrounding areas must be prioritised in order to support the strategies outlined in the County Development Plan.

Celbridge Community Council is disappointed that the closing date chosen for submissions on the Draft County Development Plan is the day before the Preliminary Population Report from Census 2016 is due for publication. An analysis of the census data will provide us with a much clearer picture of the challenges that Celbridge faces and the supports that will be needed.

Kildare County Council must incorporate the latest census figures into the final County Development Plan and Celbridge Community Council would welcome the opportunity to revise our submission in light of the new figures.



Chapter 2. Core Strategy

In light of the importance that is placed on the Core Strategy in development plans, Celbridge Community Council believes that this chapter in the draft plan requires some clarifications. We wish to ensure that Celbridge is not portrayed in a way that obscures the reality of its size, rate of growth and density of population.

The Core Strategy chapter purports to outline the context for County Kildare's development plan in section 2.3 focusing on population growth and density amongst other things. Celbridge Community Council asserts that the approach taken here trivializes the significance of Celbridge as the third largest and second most densely populated town in Co. Kildare based on the following:

- Inaccuracy in the data relating to population density in Section 2.3.1.2 - there is a reference to concentrations of over 3,000 persons per square kilometre in major urban centres like Naas, Newbridge, Leixlip and Athy yet the only towns in Kildare with population densities over 3,000 persons per square kilometer are Sallins, Celbridge and Kilcock (see Socio-Economic Baseline Report as part of the Kildare Local Economic & Community Plan 2016-2021).

This section needs to be revised to remove the erroneous implication that population densities of this order are commonplace in a number of towns.

- The focus on municipal districts in the population data presented in Section 2.3.1.2 masks the rate of growth within Celbridge town itself due to Celbridge being represented as part of the Celbridge-Leixlip MD. The Draft County Development Plan states that the population increase in the Celbridge-Leixlip Municipal District was a "modest 7.7%" yet CSO figures for 2006 and 2011 indicate that the population increase in Celbridge town was 13.2% (2275 increase) which is slightly above the 12.9% average rate of growth for the county.

The population increase in Leixlip during the same time was 5.3% (776 increase). The figures quoted for the Celbridge-Leixlip MD in Figure 2.1 should be checked for accuracy against Census 2011 data - the population increase for the municipal district was 3051 rather than 2631.

The above mentioned downplaying of Celbridge's size and population density feeds into an overall picture of Celbridge as a far less significant town than it is in reality.

The Economic Strategy outlined in section 2.11 blurs the categorization of Celbridge. Maynooth and Leixlip are clearly designated as Primary Economic Growth Towns but Celbridge is not explicitly called out as being either a Primary or a Secondary Economic Growth Town. All that is stated in this chapter is that Celbridge is clustered with the North East Kildare towns of Maynooth, Leixlip and Kilcock. The Celbridge ISP Plan 2016-2020 has interpreted this to mean that Celbridge is a "Primary Economic Growth Town" but this chapter of the Draft County Development Plan is unclear.

On the basis that economic clusters

are to develop in a mutually dependent way, so that the amenities and economies of the whole cluster are greater than the sum of the individual parts

Celbridge Community Council believes that Celbridge must to be prioritized for provision of social infrastructure on the basis of its larger population.



Chapter 3. Settlement Strategy

Celbridge Community Council believes that the number of housing units proposed for Celbridge (as outlined in Table 3.3) is inconsistent with Celbridge's position on the settlement hierarchy relative to Leixlip and Maynooth and with the policy in section 3.8

To direct growth into the Large Growth Towns, followed by Moderate Sustainable Growth Towns and Small Towns, whilst also recognising the settlement requirements of rural communities.

With occupancy levels per housing unit remaining unchanged, 4224 housing units would see Celbridge's population increase by nearly 12,000 inhabitants before 2023. Of the 9952 housing units proposed for the 3 towns, 35% are earmarked for Maynooth, 22.5% for Leixlip and 44.5% for Celbridge. In addition, Celbridge supposedly only has a capacity for 2,681 housing units on land that's currently zoned residential leaving a deficit of 1,543 (Table 3.4). This is by far the highest deficit noted for any of the towns in Co. Kildare.

Due to its population, Celbridge stands out as an anomaly amongst the 15 towns that have been designated as "Moderate Sustainable Growth towns" in the Greater Dublin Area; it has the population expected of a "Large Growth Town" but not the infrastructure.

Celbridge Community Council believes that Celbridge will be unable to absorb the proposed allocation of new housing units for a number of reasons, including:

- Insufficiently high quality public transport connections to and from Celbridge
- Very high level of car dependency amongst inhabitants of Celbridge.
- Deficits in the existing physical and social infrastructure (the culmination of many years of insufficient investment for a town of its size).

Celbridge Community Council believes that it makes no sense for Celbridge to be allocated such an aggressive increase in the number of housing units when other development centres at a higher level on the settlement hierarchy are allocated lower numbers.

Given Celbridge's status as the third largest town in Co. Kildare after Newbridge and Naas, Celbridge Community Council believes that the County Development Plan must commit to support for social infrastructure being proportional to the population of a town.



Chapter 4. Housing

Regarding the following from Table 4.1 which addresses the link between high density development and high capacity frequent public transport networks

Public Transport Corridors

To maximise the return on transport investment, it is important that land use planning underpins the efficiency of public transport services by sustainable settlement patterns – including appropriate densities – on lands within existing or planned transport corridors. Walking distances from public transport nodes (e.g. stations /bus stops) shall be used in defining such corridors within local area plans. Higher densities shall be determined on a site by site basis for sites within 500 metres walking distance of a bus stop, or within 1km of a rail station with decreasing densities with distance away from such nodes. These densities shall take into account the capacity of public transport.

There is very little development capacity within 1km of Hazelhatch train station and most of the town's population lives much further than 500m from a bus stop. Additionally, the capacity of public transport to parts of the town which are along bus routes is nowhere near high enough to justify the highest density for developments.

Celbridge Community Council submits that the highest density cannot be considered as an option for Celbridge and that guidelines in the County Development Plan should be clearer on preconditions for higher densities. Celbridge Community Council proposes that this item in Table 4.1 be more firmly worded to protect from high density development without the necessary transport service actually being in place (planned is not an adequate commitment) and without there being a commitment to the long term maintenance of a transport service for communities living in higher density developments.

Regarding section 4.6 on “Mix of Dwelling Types”, the established character of housing in Celbridge is 3-4 bedroom family homes with private gardens. It is evident on consultation with new residents and local estate agents that this is what home buyers look for; very few without strong connections to the area are interested in moving into 1 or 2 bedroom apartments / townhouses. Additionally, on analysis of the age profile data from Census 2011 (which we expect to be reinforced by Census 2016 data patterns) the evidence is firmly that Celbridge will continue to need primarily 3 and 4 bedroom homes.

Clever design is required to achieve a density of 30-50 units per hectare as is indicated in Table 4.2 for Outer Suburban /'Greenfield' sites or 50 units per hectare on Public Transport Corridors. Celbridge's experience of higher density developments has been of a very congested feel with inadequate car parking, garden space and amenities. Thus, regarding the following objective in section 4.6

MDO 2: To specify target housing mixes, as appropriate, for certain sites and settlements as part of the Local Area Plan, Small Town Plan or Settlement Plan processes.

MDO 3: To require that applications for residential or mixed use development with a residential element are accompanied by a Statement of Housing Mix, in accordance with Table 17.3, to address the mix of dwelling types proposed. The Statement of Housing Mix should demonstrate a need for such accommodation, based on local demand and the demographic profile of the area.

Celbridge Community Council submits that clarification is needed as to how specific “Target Housing Mixes” will be determined for Local Area Plans and that, in tandem with clarifying Table 17.3 (see submission under chapter 17), the requirement that applications submit a Statement of Housing Mix must apply for developments with 30 or more units proposed per hectare in Large and Moderate Sustainable Growth towns.



Chapter 5. Economic Development, Enterprise and Tourism

Economic Development

Celbridge Community Council feels that the impression conveyed is that as a town within a Primary Economic Growth Cluster, Celbridge will not be viewed significantly differently to the Primary Economic Growth Towns that it supports in the cluster.

Celbridge is on a par with the towns that it supports in consideration as an employment centre, for example the point made in section 5.3.2 about there being a shortfall of zoned employment lands in the three northern towns (Maynooth, Leixlip and Celbridge).

Additionally, all towns in a Primary Economic Growth Cluster are listed in the top row of the “Hierarchy of Employment Centres” in table 5.2. The Celbridge ISP Plan 2016-2020 states that Celbridge is a Primary Economic Growth Town so this appears to be the impression others may have received. The messaging is a little indirect but Celbridge Community Council believes that the situation is somewhat clearer in this chapter than it is in section 2.11 of the Core Strategy chapter.

Celbridge Community Council recommends that the County Development Plan is more explicit here.

Tourism

In view of

- South Dublin County Development Plan’s objective “To seek the extension of the Grand Canal Way Green Route from the 12th Lock to Hazelhatch in partnership with Waterways Ireland and Kildare County Council” (HCL11 Objective 7) and their listing of this greenway in its "Six Year Cycle Network Programme" and
- the fact that a very short stretch of this proposed greenway by the Grand Canal is in County Kildare,

Celbridge Community Council would like to see an objective for the greenway explicitly mentioned in section 5.16 of the Kildare CDP. This is broadly covered by objective WCO 5 in section 6.5 but Celbridge Community Council feels that explicit mention of the greenway project will heighten awareness of the value to be gained from filling the gap between the Inchicore-Lucan Greenway and the new Greenway from Hazelhatch to Ardclough that forms part of Arthur's Way.

The benefits of this Greenway extend beyond tourism and recreation as it would also provide a safe, scenic and very direct cycling route for commuters.



Chapter 6. Movement & Transportation

Public Transport

The level of car dependency in Celbridge is very high (see Socio-Economic Baseline Report as part of the Kildare Local Economic & Community Plan 2016-2021) suggesting an inadequate public transport offering for the town.

The Draft County Development Plan interlinks the development of Celbridge and Leixlip yet there is no direct public transport link between the two towns. Many workers and students commute from Celbridge to Leixlip or to parts of West Dublin along the N7 or beyond yet they have no public transport options available to them. Additionally, future facilities such as the proposed swimming pool at Leixlip Amenities Centre will require public transport in order for the facilities to be fully accessible for Celbridge residents.

Irish Rail runs a feeder bus service between Celbridge and Hazelhatch for some peak hour services. However, this does not serve all trains and members of the public are ill-informed of its timetable and where it stops. Celbridge Community Council proposes that bus stops with timetable information be installed along the feeder bus route. We are confident that more residents of Celbridge would travel by train if the stations at Hazelhatch and Louisa Bridge in Leixlip were more easily accessible by public transport.

In view of the Greater Dublin Area Regional Planning Guidelines indicating that growth in Moderate Sustainable Growth Towns

“needs to ensure that expansion is based on and related to the capacity of high quality public transport connections and the capacity of social infrastructure. Emphasis should be placed on encouraging good local connections to adjoining suburbs and towns and employment locations within the metropolitan area through bus corridors and good cycling and walking connections.”

Celbridge Community Council proposes additional Public Transport policies along the following lines:

- To support local bus routes within the North East Kildare metropolitan area
- To support orbital bus routes between North East Kildare and areas of West Dublin

Improvements to public transport connections would also be of benefit to tourists wishing to visit Celbridge.

Additional Bridge over the Liffey

Traffic problems caused by the bridge have a negative impact on commuters, school drop offs and businesses trading in the town centre. The scale of residential development envisaged for Celbridge during the 6 year period covered by the CDP and beyond would further exacerbate the existing traffic problems, particularly those caused by the bridge.

Celbridge Community Council notes that the CDP lists both a new bridge crossing and an upgrade of the existing bridge from the Celbridge LAP as “Priority Road and Bridge Projects” but Celbridge Community Council wishes to emphasise that extensive residential development should be carefully timed to be completed only after the new bridge has been built to ensure that there is not a noticeable influx of additional residents trying to cross the existing bridge. This is essential to give local businesses a fighting chance and for the safety of all bridge users.

The Feasibility Report completed in May 2015 supports our view in its conclusion that an additional river crossing is required to be operational in Celbridge in the near future (2019).

Celbridge Community Council is in agreement with the conclusion of the Feasibility Report that the Donaghcumper location for the new bridge is unsuitable and we urge that no further consideration be given to this location in order to avoid costly delays. Better suited and less contentious sites have been identified in the Feasibility Report.



Chapter 7. Infrastructure

Areas of Celbridge suffer from low water pressure and there are ongoing issues with regard to sewerage spills. Failure to prioritise remedial works to resolve these issues will lead to graver problems as more housing is built.

Irish Water's responsibilities for the public water supply is clear but given the uncertainty surrounding the future of that body and the fact that the citizens of County Kildare need an advocate for their local water needs in the national context, Kildare County Council must give a stronger commitment to its citizens in the County Development Plan.

The somewhat detached tone of statements like the following in section 7.2.1:

The Council will therefore strive to promote key water supply projects to facilitate the future development of the County in conjunction with Irish Water.

does little to reassure that County Kildare will have a voice in the improvement of the public water supply and networks. Kildare County Council needs to be motivated by more than the future development of the county and must be committed to supporting the successful delivery of water services including remedial works to existing networks.

Regarding the following in section 7.2.2

The capacity of treatment works and the associated networks will be a key factor that will influence the future development of the County.

Celbridge Community Council submits that a clearer plan must to be outlined indicating the capacity levels and quality of networks that are deemed essential in each local area to support the development that is projected by this County Development Plan.

Unless such a plan is formulated in the near term (we would suggest by the end of 2017), development risks running ahead of infrastructure; an upgrade of the already inadequate network and provision of adequate wastewater treatment facilities must be in place before any significant development occurs.

Flooding is a significant problem in the Celbridge-Hazelhatch region and flood risk has been the cause of a number of planning refusals including the hugely important building of permanent school buildings for St. Patrick's NS and Celbridge Community School. The area around Hazelhatch train station appears not to be a viable location for development due to risk of flooding so the opportunity to create a high density sustainable neighbourhood within the ideal 1 km walking distance of the train station is lost. Nowhere else in Celbridge is close enough to high capacity public transport to justify high density development.

Regarding section 7.2.4

Catchment Flood Risk Assessments and Management Studies (CFRAMS) are ongoing and include the river catchments of the key water courses in the county.

and the following Surface Water and Flooding Policies (Section 7.5.5)

SW 3: To support and co-operate with the Office of Public Works (OPW) in delivering the Catchment Based Flood Risk Assessment and Management Programme in particular the Eastern and South Eastern CFRAM studies and associated Flood Management Plans (FRMP). The recommendations and outputs arising from these studies shall be incorporated in preparing plans and assessing development proposals.



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SW 19 To liaise with the Office of Public Works (OPW) in delivering flood management and alleviation programmes to include, but not limited to, the following:

- *South Eastern CFRAMS and the recommendations therein.*
- *Eastern CFRAMS and the recommendations therein.*
- *Newbridge Surface Water Improvement Schemes.*
- *Morrell River Flood Management Scheme.*
- *Hazelhatch Flood Management Scheme*

While the County Development Plan acknowledges the CFRAM studies and aims to incorporate the findings, given the imminent finalisation of the Flood Risk Management Plan (2016 Eastern CFRAM Study due this year), the FRMP must be reviewed and the final County Development Plan must make focused reference to its findings in stated policies and objectives (Eastern CFRAM Study).

There are no policies or objectives in sections 7.5.5 or 7.5.6 relating to zoning decisions for flood risk areas. Celbridge Community Council submits that a policy should be added along the following lines:

To ensure that zoning decisions in flood risk areas are guided by the findings of CFRAM studies and associated Flood Management Plans (FRMP) to include, but not limited to, the following:

- *South Eastern CFRAMS and the recommendations therein.*
- *Eastern CFRAMS and the recommendations therein.*
- *Newbridge Surface Water Improvement Schemes.*
- *Morrell River Flood Management Scheme.*
- *Hazelhatch Flood Management Scheme.*

Chapter 8. Energy & Communication

Communication services are essential to attract new business and sustain existing business. The Greater Dublin Area RPGs strategy of branding the North East Kildare Economic Area as a centre of excellence in the knowledge based economy indicates that broadband services must be upgraded wherever deficient particularly within the boundary of this economic area.



Chapter 9. Retail

Celbridge Community Council welcomes the policy stated in section 9.4.4 to

promote and progress the delivery of the integrated expansion of Celbridge Town Centre while taking account of its Georgian streetscape and historic setting and to facilitate town centre consolidation, through the re-use and regeneration of backlands and other key lands and buildings around the town centre.

but notes that the perceived opportunities for redressing the underperformance of Celbridge in retail are the redevelopment of

...the backlands to the east of the town centre and Donaghcumper Demesne, with respect for the heritage and landscape of both areas being of significant importance.

Celbridge Community Council is supportive of development that

- opens up the banks of the River Liffey for the enjoyment of the general public
- provides entertainment facilities such as a cinema
- provides a performing arts venue
- provides additional retail outlets on the Main Street
- addresses the traffic problems that deter shoppers from shopping in the town centre

provided any such development is sympathetic to the heritage of the town.

Chapter 11. Social, Community & Cultural Development

Celbridge Community Council believes that Celbridge and its rich heritage must be protected for the enjoyment of today's generation and generations to come. In light of development of tourism in Celbridge being prioritized during the initial phases of implementation of the ISP Celbridge Plan 2016-2020, Celbridge Community Council would like to see a commitment in section 11.9 of the County Development Plan to support the ISP in delivering on its priorities.

Celbridge has the potential to become an important tourist centre in its own right but also to act as a tourism hub for the North East Kildare region. Celbridge Community Council would like to see provision of a Heritage Centre in the town as an objective in section 11.10. Celbridge Community Council also wishes to see serious consideration being given to Celbridge as a location for the performing arts space for North Kildare to be provided on the back of objective ACO 4.

The extension of entitlement to free Early Childhood Care and Education (ECCE) from the next intake after a child's 3rd birthday is increasingly resulting in parents holding their children until they are aged 5 or more before starting primary school. This keeps children learning through play, as is age appropriate, for as long as possible. However available places for preschoolers are lacking. This is a problem countrywide but given the higher than average numbers of young families in Co. Kildare, pressure on places in early childcare and education services (playschools, Montessori's and crèches) is pronounced here. Although some services have the capacity to expand their operations, many do not and the situation is particularly acute in Celbridge. Celbridge Community Council believes that the policies and objective outlined in section 11.13 must acknowledge and support the challenges posed for the childcare sector due to changes in the ECCE scheme.

Celbridge is currently at maximum capacity in terms of school places and many secondary school children have travelled outside of Celbridge for their education. Both a primary and a secondary school are currently being housed in temporary accommodation. The permanent schools were to be built alongside each other but



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planning permission was refused due to the risk of flooding at the proposed sites. A suitable site for St. Patrick's National School and Celbridge Community School must be identified and zoned on the south side of the river Liffey. The temporary school building for Celbridge Community School which is nearing completion on a site at Moortown will cater for 350 pupils for up to 5 years and this should be adequate to meet demand in the short term but any significant rise in the population of Celbridge will once again put pressure on the schools.

12. Architectural and Archeological Heritage

While Celbridge Community Council welcomes the acknowledgement in section 12.5 that

"Piecemeal development of demesnes can be detrimental to the historical and architectural importance of the demesne and country house. It is an objective of the Council to prohibit development in gardens or landscapes which are deemed to be an important part of the setting of a protected structure or where they contribute to the character of an Architectural Conservation Area."

the fact that Celbridge has not been designated as an Architectural Conservation Area, raises serious concern for the protection of our architectural heritage.

Celbridge Community Council therefore welcomes section 12.7.1's objective ACA 1

"To investigate the designation of further ACAs at appropriate locations throughout the county including Celbridge, Johnstown, Ballymore Eustace, Kilcullen, Brannockstown, Rathmore, Clane and Newbridge."

but submits that the Council objective to protect Architectural Conservation Areas should also extend to candidate ACAs such as those listed in the ACA 1 objective.

14. Landscape, Recreation and Amenity

The Celbridge ISP Plan 2016 – 2020 highlights a number of deficits in recreational facilities in the town, in particular for teenagers. Celbridge Community Council agrees with the ISP plan's assertion that community facilities and amenities must be considered as a central component of town planning and welcomes the policy outlined in section 14.12.4 of the draft County Development Plan *"to seek to promote additional non mainstream facilities for children and teenagers through the provision of suitable recreation and amenity facilities in all major towns and villages"*. In light of young people being prioritized during the initial phases of implementation of the ISP Celbridge Plan 2016-2020, Celbridge Community Council would like to see a commitment in section 14.11.5 of the County Development Plan to support the Celbridge ISP in delivering its objectives.

While Celbridge Community Council welcomes the policy outlined in section 14.12.4 of the draft County Development Plan *"to complete the swimming pool programme... through the provision of a north Kildare swimming pool within the Leixlip Amenities Campus"*, there is concern about the accessibility of the Leixlip Amenities Sports Centre location for residents of Celbridge. If this location in Collinstown is to be the chosen location, a commitment must be given to supporting local bus routes within the North East Kildare metropolitan area to allow Celbridge's large population to fully avail of the facilities.



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Chapter 17. Development Management Standards

Celbridge Community Council submits that the thresholds in Table 17.3 must be revised and that the following paragraph in section 17.4.3

A Housing Mix Statement will be required for applications that fall below the thresholds set out in Table 17.3, where the number of units permitted under previous applications on the landholding when taken in conjunction with the number proposed in the subject application would cumulatively meet or exceed the threshold.

is confusing and needs to be rephrased – it talks about falling below the thresholds on one hand and meeting or exceeding the threshold on the other.

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

Yours sincerely,

David Trost

Secretary

Celbridge Community Council