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### **Public Consultation on EMRA's Draft Regional Spatial and Economic Strategy**

Celbridge Community Council welcomes the opportunity to make a submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midlands Region.

We welcome that an attempt is being made to bring both the spatial and economic factors for the Region together into one all-encompassing strategy as it's crucial for the success of the region that these factors be intertwined. Each settlement has its own characteristics but the various elements addressed by the Draft RSES strategy feed into one another and the overall outcome for each community will depend upon getting the correct balance between the Regional Strategic Outcomes outlined in the Draft RSES.

Celbridge has a number of strengths not least of which are a highly educated workforce, a past steeped in significant historical stories and a rich heritage, both natural and built. Celbridge Community Council firmly believes that the RSES needs to provide the framework whereby our town will grow in a sustainable manner whilst preserving our rich heritage.

Like other parts of the Dublin Metropolitan Area, Celbridge has significant challenges in areas such as transport, housing, amenities, sustainability and liveability. The range of challenges to be tackled is significant and includes high commute times, high rates of car dependency, inadequate cycling infrastructure so cyclists feel unsafe, repressed retail activity, low levels of service and supports for health, low levels of service and supports for children and young people, lack of play facilities for young people, inadequate level of policing, untapped potential in community facilities, over-subscription for activities, insufficient amenities in the locality, poor job to resident workers ratio, etc.

We have a number of points to make relating to aspects of the Draft RSES:

#### **Chapter 3 Growth Strategy**

We wish to point out a small inconsistency in the document – Celbridge is listed with Hinterland settlements under the **Hinterland Area** heading on p.29 when it is in fact a Dublin Metropolitan Area settlement. The point being made that “over half of all trips to work or education are to Dublin’s urban core” is true but Celbridge is in all other places included in the Dublin Metropolitan Area.



## Chapter 5 Dublin MASP

Celbridge Community Council had expected a separate consultation on a more detailed Dublin MASP but it appears that Chapter 5 of the Draft RSES *is* the Dublin MASP! We find this to be quite vague as we had hoped that the Dublin MASP would outline a clearer strategy for the Dublin Metropolitan Area. Perhaps the vagueness is deliberate and all detail is being left to local authorities to define in development plans but this leaves a lot open to interpretation and we had hoped to see

- guidelines for local authorities whose administrative areas are primarily in the Hinterland Region but who will need to drive significant growth within the Dublin Metropolitan Area (Kildare, Meath and Wicklow) on how to balance the promotion of Key Towns with growth and investment in Moderate Growth settlements both
  - generally, and
  - in scenarios where the Key Growth towns cannot be developed at the targeted pace
- a framework whereby all settlements with infrastructural constraints are protected from further development until their infrastructural deficits are addressed and that this protection would exist regardless of a settlement's position in the settlement hierarchy

We believe that the designation of Celbridge and Leixlip as Moderate Growth settlements acknowledges concerns about infrastructural constraints that would hinder large scale growth in these towns. However, we understand that Maynooth is also constrained in its ability to grow as it has a number of dependencies on infrastructure projects and we find Chapter 5 very unclear on how the demand for housing in the North Kildare area outside of Maynooth should be balanced with the promotion of Maynooth as a Key Town. The Draft RSES is silent on how settlements in the Dublin Metropolitan Area without any Strategic Development Zones should be developed and we would prefer some degree of protection against the risk of a stream of successive "smaller than Strategic Development Zone, but still significant" developments being permitted without investment for rectifying infrastructural deficits.

As it stands, planning permission may be granted for significant amounts of the lands currently zoned for residential development (zoning is for 3,519 dwelling units in the Celbridge Local Area Plan 2017-2023) before the LAP is updated to incorporate the RSES strategy and those planning decisions will not be bound by the NPF / RSES so the deficits may be further exacerbated but we would like to see something in the RSES that protects towns with infrastructural deficits from excessive over-development once planning decisions are in fact bound by the RSES.

We see a target figure of 30% quoted multiple times throughout the document as the percentage of all new homes to be built within or contiguous to the built-up area of settlements within the wider Dublin metropolitan area. This is formalised in the following objective in Chapter 9:

*RPO 9.9: Local Authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and at least 30% of all new homes within or contiguous to the built-up area of metropolitan settlements within the wider Dublin metropolitan area.*

We are unsure if this means that

- 50%+ of all housing will be built in Dublin city and suburbs and 30%+ of all housing built will be in the wider Dublin metropolitan area, or
- 50%+ of all housing built in Dublin city and 30%+ of all housing built in the wider Dublin Metropolitan Area must be on brownfield sites or infill sites



Either way, there are no figures to guide Kildare County Council on how they should divide the number of dwellings allocated for development across the different settlements. We fear that without this guidance, Celbridge will continue to be expected to punch above its weight on new housing but without investment in existing deficits. Significant housing must be concentrated at locations close to employment and public transport (where employment destinations can be reached ideally within 45 minutes) in preference to commuter towns that have been over-developed with housing without accompanying services and infrastructure until such a time as the deficits are rectified. We are not advocating for no development in Celbridge as there is a clear demand for housing in Celbridge; what we are advocating for is an unambiguous framework for development supported by the infrastructure needed to rectify existing problems.

### **River Liffey Greenway**

The following is listed as a greenway of strategic value

*River Liffey Greenway from Dublin Port along the Liffey Quays to **Leixlip**. Cross-connections are proposed through the Phoenix Park linking the Royal Canal to the Grand Canal*

In a “pre-recession” (2006) [Towards a Liffey Valley Park<sup>1</sup>](#) strategy, provision is made for an integrated management framework for the Liffey Valley and consultants were of the opinion that actions to create a park should concentrate on the area between Islandbridge and Celbridge.

The ambitions of 15 years ago are as strong today as they were then so Celbridge Community Council would like to see this changed to

*River Liffey Greenway from Dublin Port along the Liffey Quays to **Celbridge**. Cross-connections are proposed through the Phoenix Park linking the Royal Canal to the Grand Canal*

## **Chapter 6 Economy & Employment**

Celbridge’s most obvious economic strengths are its highly educated workforce and its history and heritage, both natural and built.

Celbridge’s workforce could be tapped into by new enterprise at the former Hewlett Packard site, Maynooth University, Grange Castle and home-grown enterprises in Celbridge. Many would be only too happy to shorten their commutes if suitable opportunities presented themselves closer to home.

Celbridge has notable tourism potential from its many sites of significant historic importance, to its host of interesting stories, to its associations with an array of significant figures from the past, to the natural heritage of the River Liffey. Some of the opportunities have been tapped into but many more remain untapped.

Given the strong associations between Castletown House and Demense, the historic core of Celbridge and other demesnes along the Liffey, there are significant opportunities to extend the visitor experience and to sensitively develop Celbridge as a tourism, heritage and leisure destination in keeping with the following from the Draft RSES

*“A safe, clean environment, scenic landscapes and rich heritage contribute greatly to our cultural identity and quality of life, and are key attractions for overseas visitors to the island of Ireland.”*

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<sup>1</sup> <https://www.sdcc.ie/en/services/planning/local-area-plans/non-statutory-plans/existing/liffey-valley-park/>



Celbridge has a "[Celbridge: Gateway to Ireland's Ancient East](#)" Tourism & Heritage Strategy<sup>2</sup> for the period from 2016-2020 but it would benefit from regional direction as it proposes "packaging" Celbridge as a destination with other locations nearby so, in relation to the following objective:

*RPO 6.17: Support the preparation and implementation of Local Authority Tourism Strategies and Diaspora Strategies. All tourism strategies and plans should include clear monitoring protocols to monitor the ongoing effect of tourism on sensitive features with particular focus on natural and built heritage assets.*

Celbridge Community Council suggests that tourism strategies that cut across Local Authority boundaries would be more conducive to promotion of coherent visitor experiences based on themes. It may be better to express the above objective differently to allow, for example, support for further work on themes under **Ireland's Ancient East**.

Celbridge Community Council feels that the following objective is very important and that the findings should be published as open-data

*RPO 6.30: Design and implement a basic framework with the CSO to build a common, up-to-date, dynamic and shared evidence base and monitoring framework at regional and local level with information on assets, economic base, settlement functions, and economic performance.*

Celbridge Community Council would like to see objectives to

- increase the ratio of jobs to resident workers
- realise a downward trend in commute times

especially at locations which have higher numbers of residents commuting for over 45 minutes to their places of work due to the negative impact on wellbeing that lengthy commutes have on people.

## **Chapter 6 Economy & Employment + Chapter 7 Environment**

### **River Liffey**

Celbridge has historically been defined by its position on the River Liffey and its proximity to major routes out of Dublin. It is crucial that the River Liffey and its ecosystem along the entire length of the river be protected yet access be facilitated to it in a sympathetic way at locations such as Celbridge where such access would both benefit the local community and strengthen the visitor experience that can be offered to tourists.

The current Celbridge LAP has the following objectives

- To support and facilitate the development of an integrated network of Greenways and Heritage Trails along suitable corridors in Celbridge, including pathways along the River Liffey corridor, subject to relevant environmental assessments.
- To protect, conserve and enhance the unique built and natural heritage of Celbridge, including the River Liffey, the architecture and streetscape of the historic town centre, and the houses and associated designed landscapes of the surrounding demesnes.

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<sup>2</sup><http://www.kildarelcdc.ie/wp-content/uploads/2012/07/Celbridge-Gateway-to-Irelands-AE-Tourism-Heritage-Strategy-May-2016.pdf>



Celbridge Community Council would like regional objectives to be included in the RSES to support both protection of and access to the Liffey – see the 2006 [Towards a Liffey Valley Park](#)<sup>3</sup> strategy.

## Chapter 8 Connectivity

- **Car dependency**

Celbridge badly needs “investment in infrastructure and behavioural change interventions to encourage and support a shift to sustainable modes of transport” and “design solutions and innovative approaches to reduce car dependency”<sup>4</sup>. The rate of **car dependency** in Celbridge is more comparable with Hinterland areas than with the other major settlements in the wider Dublin Metropolitan Area (Greystones, Swords, Bray, Leixlip, Maynooth, Malahide). There are many reasons for this including distances to public transport (bus stops and Hazelhatch train station), greater efficiencies being realised from using a single mode of transport from origin to destination, parents’ needing to have cars to drop/collect their children from schools/ childcare, etc. Fundamentally though, the end-to-end journey can be achieved by many in 30-60 minutes by private vehicle (if they leave early!) where public transport options would take at least 30 minutes longer (60-90 minutes).

The proposal to run the DART service out as far as Hazelhatch with increased capacity is very welcome but provision of this service and increased capacity on rail is unlikely to be the silver bullet that the NTA hopes for unless the service is made accessible to passengers. The 2018 BusConnects network redesign proposals included some improvements to bus connectivity for Celbridge but, since there are no bus prioritisation measures in or around the town, buses are as badly affected by traffic congestion as private vehicles. The real benefits from public transport enhancements will only be realised once impediments to accessing public transport are addressed.

A second bridge over the Liffey may alleviate traffic congestion for some time but if Celbridge continues to grow at the rate it has in the last 20 years without public transport needs being properly analysed or access to public transport being prioritised, then even a second bridge will not be enough. Celbridge in 2040 may be at least as congested as it is today.

Regarding the following objectives:

- **RPO 8.4:** *Land use plans within the GDA shall demonstrate a consistency with the NTA’s Transport Strategy for the Greater Dublin Area and plans outside of the GDA shall be informed by the guiding principles expressed in the draft RSES.*
- **RPO 8.5:** *In order to give local expression to the regional level Transport Strategy within the Region in conjunction with the NTA, Local Transport Plans (LTP) will be prepared for selected settlements in the Region.*
- **RPO 8.7:** *The RSES supports delivery of the bus projects set out in Table 8.3 subject to the outcome of appropriate environmental assessment and the planning process.*

Clearly Celbridge is a settlement that requires a Local Transport Plan but we would go a step further and propose that a detailed North Kildare / West Dublin Transport Plan also be prepared that focuses on getting the residents of these areas to and from their desired destinations using sustainable modes of transport.

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<sup>3</sup> <https://www.sdcc.ie/en/services/planning/local-area-plans/non-statutory-plans/existing/liffey-valley-park/>

<sup>4</sup> Guiding Principles for Integration of Land Use and Transport, p.145 Draft RSES



Proposals for the implementation of all public transport strategy seems to be getting rolled into the NTA's **BusConnects** projects but so far these are being progressed in a very "broad strokes" manner at Dublin Metropolitan Area level. It was clear from the report that was produced<sup>5</sup> and from a number of conversations we had with the NTA in August and September 2018 that the needs of North Kildare had not been analysed in great depth. The whole network redesign has returned to the drawing board so decisions for North Kildare are being deferred until the design for the whole of the Dublin area is reworked. Express transport to Dublin city centre on radial routes is of huge importance but, given the priorities expressed in the Draft RSES, connectivity to nearby settlements and employment locations will also be crucial. Celbridge Community Council feels that an indepth analysis of travel patterns and desire lines in the whole of the Dublin Metropolitan Area west of a North-South line between Blanchardstown and Tallaght should be performed with a view to devising a Transport Plan for the sub-region as a whole - looking at each settlement in isolation will not provide a rich enough picture of the needs of residents of North Kildare and West Dublin to enable decisions on the best orbital and local bus services.

#### M4/N4

Regarding the inclusion of the M4 Maynooth to Leixlip stretch of the M4 that's in Table 8.4 referred to by this objective

- **RPO 8.8:** *The RSES supports appraisal and or delivery of the road projects set out in Table 8.4 subject to the outcome of appropriate environmental assessment and the planning process.*

and regarding the omission of a Park and Ride on the N4/M4 further west than Liffey Valley from this objective

- **RPO 8.12:** *The draft RSES supports delivery of the strategic park and ride projects set out in Table 8.5 subject to the outcome of appropriate environmental assessment and the outcome of the planning process.*

If improvements on the stretch of the M4 between the Maynooth and Leixlip/Celbridge exits consist of an extra traffic lane, this should help alleviate vehicles diverting through Celbridge, Leixlip and Lucan when they experience significant tailbacks on the M4/ N4 as a result of an all too frequent road traffic accident. This should alleviate congestion in these towns but, unless measures are taken to actively discourage car dependency, the same problems will recur in another decade or two as traffic volumes increase to fill the available space. Serious consideration should be given to the following measures:

- situation of a Park n Ride adjacent to the M4 at, for example, one of the Celbridge/ Leixlip exits (Junction 5 or 6) – this proposal is included on a BusConnects map
- construction of a bus lane along the M4



<sup>5</sup> North Kildare is entirely missing from the maps and analysis presented in Chapter 3 (Patterns of Demand) of the **BusConnects report** - <https://busconnects.ie/media/1235/chapter3patternsofdemand.pdf>



to incentivise drivers to transfer to bus for the last leg of their journeys into the city. These measures would make bus travel attractive to the parents who need their cars to drop and/or collect children as they tend to be under significant time pressure but this would facilitate them getting to public transport in the fastest possible way - increasing capacity on roads will do nothing to discourage motorists from using their cars.

It's also not yet known what the NTA/ TII solution will be to running a bus lane over the M50 as part of the Lucan Core Bus Corridor but one suggestion was to reduce from 2 lanes to 1 for private vehicles and this is likely to have impact quite a way back out the N4.

## Chapter 9 Quality of Life

While there are many Regional Policy Objectives that might theoretically be beneficial to Celbridge listed in Chapter 9, we fail to see anything in this Draft RSES to convince us that investment in Quality of Life will be any more robust under the National Planning Framework than under the National Spatial Strategy.

A list of objectives was pulled together for Celbridge in 2015 and documented in the Celbridge 2016-2020 Integrated Services Programme (ISP) Plan<sup>6</sup> under the following goals

- Children & Young People
- Health
- Education & Training
- Community Facilities & Amenities
- Safety
- Tourism & Heritage
- Enterprise & Employment
- Infrastructure & Transport

and while some work was completed relating to some of these, the initiative doesn't seem to be getting financial support so we would like to see something in the Draft RSES to convince us that there will be actually be investment to see objectives such as those listed in the ISP progressed.

It appears to us that a lot of in-depth analysis and constructive engagement with stakeholders under the ISP has languished through lack of funding so it would be welcomed if the Draft RSES contained something more concrete regarding the nature of support for Quality of Life objectives where imbalances exist.

## Chapter 12 Implementation & Monitoring

It's unclear what indicators will be used by the Office of the Planning Regulator for monitoring but ideally these indicators could be used in a scorecard format to track progress towards a balanced achievement of targets that measure not just the number of dwellings delivered but also things like the number of jobs facilitated, the reductions in commute times achieved through public transport improvements, increases in numbers using public transport, the numbers choosing active forms of

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<sup>6</sup> <http://www.kildarelcdc.ie/wp-content/uploads/2012/07/ISP-Celbridge-Plan-2016-2020.pdf>

This Integrated Services Programme (ISP) Celbridge 2016-2020 Plan was developed for Celbridge following analysis, stakeholder consultations (interviews and focus groups) and a community survey involving over 700 people. This was initiated by the Kildare County Development Board in 2010 and came under the remit of the Kildare LCDC from 2014. The report was published in 2015 and outlined a number of priorities for Celbridge based on evidence through an extensive research and planning process. Kildare County Development Board, initiated the ISP in 2010, and Kildare LCDC continued commitment to the programme for a time.



transport due to provision of greenways etc. Not only would these be monitored but the figures would be actively used to promote healthy placemaking at each location by identifying imbalances which would in turn prompt interventions to rectify serious imbalances before permitting further housing to be built at a location. All pieces of the jigsaw need to be in place to promote ensure the dynamism and ensure sustainability of settlements like Celbridge.

We trust that the points raised by Celbridge Community Council will be taken into consideration in your final version of the Regional Spatial and Economic Strategy.

Yours faithfully

Helen Rice  
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Celbridge Community Council