



**Submission to An Bord Pleanála  
Regarding Proposed Oakley Manor SHD  
at Shackleton Road, Oldtown, Celbridge, Co. Kildare**

**31<sup>st</sup> January 2019**



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W23 P6P5

31<sup>st</sup> January 2019

Strategic Housing Unit  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

**Re: Case # 303295 - Strategic Housing Development Application for the construction of 251 residential units (167 no. houses and 84 no. apartments/duplex units), a creche (261.5 m<sup>2</sup>), diversion and undergrounding of existing 38kV overhead cable and erection of two new ESB pylons, upgrade of existing junction at corner of Shackleton Road and Old Town Road to accommodate new filter lane and crossing point; and provision of new vehicular entrance onto Shackleton Road and two new vehicular entrances onto Oldtown Road; and all associated works on Land at Shackleton Road, Oldtown, Celbridge, Co. Kildare**

Dear Sir / Madam,

As a representative voice for the community, Celbridge Community Council wishes to make a submission outlining our views regarding the above mentioned Strategic Housing Development (SHD) planning application to An Bord Pleanála. Celbridge Community Council was established as a voluntary community group in 1975 and has since 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.

This site for the proposed development is by far the most poorly located of the Key Development Areas zoned for residential development in the Celbridge Local Area Plan 2017-2023 and, as such, requires a coherent strategic execution of objectives outlined in the Kildare LECP, Kildare CDP, Celbridge LAP and Celbridge ISP if any of the town's identified infrastructural deficits are to be rectified and requires the developer to go above and beyond in terms of meeting sustainability criteria. This submission outlines a number of concerns grounded in the difficulties that residents of the Shackleton Road / Oldtown Road area already encounter accessing public transport, the national road network, services and community facilities. It also suggests measures that should be in place before development is permitted at the site in question.

We trust that An Bord Pleanála will carefully consider our concerns regarding this SHD application and impose appropriate conditions to ensure development that enhances rather than detracts from the quality of life of both the future residents of the proposed development and the existing residents of Celbridge.

Yours faithfully,

Stephen Johnston  
Chairperson  
Celbridge Community Council



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## 1. Introduction

Celbridge Community Council acknowledges the high demand for housing in Celbridge and supports the provision of same in a strategic manner that rectifies rather than exacerbates infrastructural deficits. However, Celbridge Community Council has a number of concerns from the wider Celbridge context down to the detail of the proposed Oakley Manor development application.

This submission

- outlines Celbridge Community Council's concerns regarding the proposed development
- presents more detailed thoughts on Traffic & Transport (a theme that's at the heart of many of our concerns!)
- highlights a number of needs that have been identified for Celbridge by bodies other than ourselves.

## 2. Celbridge Community Council's Concerns

### No Strategic Transport Management Plan

A strategic transport management study for Celbridge is long overdue and the **Transport Management Plan** that was due to be delivered by August 2018 has not been completed. Kildare County Council added an objective to produce this to the final version of the Celbridge Local Area Plan 2017-2023 in direct response to concerns raised by many, most notably [the Department of Housing, Planning, Community and Local Government](#)<sup>1</sup>. Celbridge Community Council considers a Transport Management Plan to be an essential tool for guiding planning decisions for Celbridge. This plan should include strategies and action items for

- **how bus prioritisation measures might be implemented** given the physical constraints (road widths, etc.) of the village so residents can get to Hazelhatch, Dublin and surrounding towns in an acceptable time by means of public transport.
- tackling the **inadequacies of the cycling infrastructure** around Celbridge to encourage higher uptake on non-vehicular transport
- delivery of the desperately needed **second vehicular bridge** and the **supporting road infrastructure** needed to relieve town centre traffic congestion and to assist residents in getting to and from Hazelhatch with as few delays as possible

### Unsatisfactory Developer's Transport Assessment

Though specifically requested by Kildare County Council to collate traffic count information and determine the proposed development's contribution to traffic levels at the Liffey bridge, the **Transport Assessment** submitted with this application cannot, we believe, be relied upon to be impartial. We found it to be "creative" in its presentation of its findings. Junction capacity analysis for the base year

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1 <http://www.kildare.ie/CountyCouncil/Planning/DevelopmentPlans/LocalAreaPlans/CelbridgeLocalAreaPlan2017-2023/1.%20Minister%20for%20Hsg%20Planning%20Comm%20%20Local%20Gov.pdf>



2014 ([RPS Feasibility Study](#)<sup>2</sup> re. new bridge) showed the River Liffey Bridge to already be operating above practical capacity during peak times so the impact of **any** increase in traffic at this location will be very noticeable. Items that merit further scrutiny are:

- when the **real AM peak time at the Liffey bridge actually is** – while 08:00-09:00 may be the AM peak when averaged across all of the junctions in Celbridge, and most certainly would be for junctions near the proposed Oakley Manor development due to schools traffic, there is a lot of movement by commuters before 08:00 and recent traffic counts performed by Clifton Scannell Emerson recognise this – the number crossing the bridge towards Dublin/ Hazelhatch between 07:00-08:00 is **86** higher than the number in Systra's report for the 08:00-09:00 period
- the **mode of transport that will be used** for travel from the proposed Oakley Manor development. The Transport Assessment
  - makes assumptions based on the 2016 Census Mode Share for Journey to Work and School or College for the whole of Celbridge – we believe that the patterns will be different in the 07:00-08:00 period as most journeys will be people travelling long distances rather than going to school and we know that this part of town has lower public transport usage and higher private vehicle usage than other parts of Celbridge that are better connected with public transport
  - estimates 97 vehicle trips from the proposed development in the AM period (08:00-09:00)
  - claims that only 40/97 vehicles will cross the bridge in the AM period (08:00-09:00) – we believe this number will be higher in the period between 07:00-08:00
- the **calculations that imply that the impact of traffic from the proposed development would be less than 5% at the bridge** as these seem to be based on a figure that is calculated from [proposed development traffic] as a percentage of [**all** traffic at the bridge - travelling in both directions] when it's common knowledge that the AM peak issues are caused by the outbound flows of traffic and it's primarily outbound traffic that the proposed development would generate during AM peak times.

## No Public Transport Strategy for Celbridge

A **strategy to address the public transport needs of Celbridge must be progressed with the NTA** as a matter of urgency. Celbridge has an extremely high and unsustainable rate of car dependency for a growing town in the Dublin Metropolitan Area that feeds high numbers of workers and students to Dublin - almost 70% of all commuters from Celbridge to Dublin city and suburbs use private vehicles. The BusConnects proposals included route suggestions that would improve the public transport service for residents of Celbridge and North Kildare and there is no reason why some of the proposals could not be progressed in advance of the full roll out of the BusConnects network redesign for the Greater Dublin Area if the appropriate pressure was put to bear on the NTA

- The Shackleton Road **needs all day public transport connectivity**



- **Car dependency** amongst residents in the Oldtown part of town is noticeably higher than in parts of town that are serviced by a more robust public transport service so development at this location will not be sustainable as the developers try to convey

## Funding for Infrastructural Improvements

The Department of Housing, Planning, Community and Local Government [raised concerns in a February 2017 letter to Kildare County Council](#)<sup>3</sup> requested Kildare County Council to look at implementing measures such as a Special Development Contribution to help **fund rectification of infrastructural deficits** and it is our view that it would be very remiss of Kildare County Council to fail to do this only to refuse to fund infrastructural changes in Celbridge in the future due to lack of funding.

## National Road Network (M4/N4) at Capacity

Measures need to be taken to protect Celbridge from being used as a rat run for **M4/N4** commuters whenever there is a road traffic accident that results in delays on the national road network – the M4/N4 needs better resilience and a Park ‘n’ Ride facility that attracts more commuters out of cars and onto sustainable modes of transport.

## Lack of Resilience in Water Supply Network

Celbridge does not currently have a **resilient water supply** or **waste water network** and its existing mains pipework needs an overhaul. This lack of resilience affected large numbers who could not benefit from a diversion of supply during a water supply outage in January 2019 – while a diverted supply was arranged, it was only beneficial to some estates and about 10,000 people were left without any water for about 36 hours. This was not a one-off as a similar issue affected the north/west of Celbridge in July 2018

## Lack of Strategy Given Peripheral Location of Proposed Development

The proposed development is **poorly located** in terms of access to

- services and community facilities
- public transport
- the national road network

The Oldtown KDA is by far the most poorly located of all the KDAs for access to everything except schools. The site is to the western side of town, about 1km from the nearest shops and 1.3km+ from

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3 <http://www.kildare.ie/CountyCouncil/Planning/DevelopmentPlans/LocalAreaPlans/CelbridgeLocalAreaPlan2017-2023/1.%20Minister%20for%20Hsg%20Planning%20Comm%20%20Local%20Gov.pdf>



the town centre. It is clearly **the most car dependant of all the KDAs** zoned for residential development under the Local Area Plan.

Distances from the location of the proposed development to services support this:

Service	Min. Distance in Km
Town Centre	1.30
Supermarket (Tesco)	1.00
Convenience store (Texaco Spar)	1.00
Healthcare / Dental	1.25
Primary school – boys	0.20
Primary school - girls	1.30
Primary school – mixed ET	1.30
Secondary school – mixed	2.70
Secondary school – girls only	0.75
Secondary school – boys only	2.70
Dublin bus – 67X (peak service only)	0.20
Dublin bus – 67 (regular service)	1.20
Hazelhatch Train Station	3.50
Regional Bus Service bus stop – 120/123	0.60
M4 Junction 6	4.20
N4 Junction 5	7.20

Kildare County Council reduced the scale of the Oldtown KDA between the Draft and Final versions of the LAP from the originally envisaged 47.5 ha (1425 units) to 13.5 ha (411 units) and reduced the density from 35 to 30 units per hectare following concerns raised in a letter from the Dept of Environment, Community & Local Government<sup>4</sup> (in February 2017 during consultation on the Draft LAP) as these lands were considered more peripheral to retail and community facilities in Celbridge.

- The proposed **density** of 35.2 units per hectare reflects the originally planned density for this KDA rather than the reduced density of 30 units per hectare as stated in the final LAP. While higher densities are to be encouraged, this is quite high given the peripheral location of the site relative to facilities, amenities and employment centres – it is concerning that no measures are being taken to improve services for the area in or close to the location of the proposed development
- Along with the reduction in size of the KDA, anything vaguely strategic regarding development of these lands and supporting infrastructure was also removed so Celbridge Community Council believes that there is now an acute risk that development here both in the short and long term will proceed in a piecemeal manner without the forethought of a Masterplan or similar to ensure proper planning and sustainable development at such a peripheral location. There is a real fear that the estate-by-estate sprawl that Celbridge has been subjected to for so long will be allowed to continue unabated without provision of community facilities, a Western relief road or anything that would add real value to both the existing and new residents of this part of town.

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4 <http://www.kildare.ie/CountyCouncil/Planning/DevelopmentPlans/LocalAreaPlans/CelbridgeLocalAreaPlan2017-2023/1.%20Minister%20for%20Hsg%20Planning%20Comm%20%20Local%20Gov.pdf>



It should be noted that land with capacity for an additional 150+ dwellings is currently for sale adjacent to this site on the Shackleton Road so it's 400+ dwellings that we'll see built in this part of town in the foreseeable future - the impact of this should be borne in mind.

## Highest Density within the Development Poorly Positioned

**Higher density** is proposed to be built in Area 3 **to the rear of the proposed development**. This will make it even less likely that residents from the higher density part of the development will walk, cycle or use public transport – distances to public transport, services and community facilities in Celbridge will be an additional 250-500m for these residents. This is unsustainable, will encourage higher car dependency and drive higher volumes of traffic through the estate. In the absence of plans to enhance services and amenities in this area of town, highest densities should be closest to the front affording residents best access to the amenities and services that already exist in the Celbridge.

## Central Boulevard

Further thought needs to be given to the main thoroughfare into the proposed development referred to by the developer as the **"central boulevard"**. Journeys will be made into this development to access play facilities and the crèche. If, as is per the design statement, this boulevard street becomes an access route facilitating "future development to the west" (if further O'Flynn lands are zoned for residential development in the future), then it will become even busier still. The specifications of the road may not be best suited to the type of usage it would be subjected to in the longer term but if no cycle paths are provided for and journeys on this route increase significantly, it won't be possible to retrofit cycle paths. Ideally such a "spine like" central boulevard would be avoided in favour of a "child safe" central space and, if future development occurs at the back, then those lands should be accessed by vehicular traffic from the Oldtown Road (beyond the site that's being reserved for a primary school)

## Crèche Location and Parking

The location of the **crèche** and number of designated parking spaces need to be reassessed given the inevitable use of the crèche by families from outside the development.

The developers seem to believe that usage of the crèche will primarily be by residents of the development but childcare facilities are at a premium in Celbridge<sup>5</sup> so their assumption will almost certainly be proven unfounded. Provision of childcare in Celbridge has not kept pace with demand.

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5 The Kildare LECP 2016-2021 highlights that while urban Kildare has on average greater numbers of pre-school services, there is very low provision in towns such as Celbridge. This confirms our experience.





The crèche facility is located in Area 3 at the rear of the development – this will mean additional traffic through the development. Additionally, provision is only made for 12 dedicated parking spaces adjacent to the crèche on the following basis<sup>6</sup>

*“The childcare facility has can accommodate 68 children and up to 12 staff members, leading to a requirement for 23 spaces. 12 dedicated spaces have been provided along the drop-off road outside the creche, and any shortfall can be accommodated in the surrounding on-street parking, which are likely to be available during operating hours. We consider this appropriate as **it is likely the majority of children will live within the proposed development and within walking distance of the facility**”*

On the basis that the developer’s assumption is incorrect, both positioning of the crèche and the number of dedicated parking spaces allocated should be re-examined.

It is also worth highlighting that the play equipment to be installed adjacent to the crèche is noted as being only for 3-6 year olds. Equipment should also be provided for 6-12 year olds in order to facilitate use by primary school children in afterschool care. A larger play space would thus be advisable at this location.

## Provision for Leisure / Play Space

Play provisions need to be improved to better cater for all age groups and to consolidate to fewer locations. Celbridge Community Council notes that the developer originally intended a large play space under the high voltage power lines<sup>7</sup> so we welcome the decision to relocate play space into the heart of the development as it will both benefit from passive surveillance and constitute an infinitely preferable play experience compared to under power lines! Whilst we support the relocation of play space away from the power lines, we question how well the proposals to dot a few small play areas for younger children around the estate meet the needs of residents.

The proposals in this planning application are as follows:

- Four small play areas are dotted around the development (two in Area 1, one in Area 2, one in 3).
- Active play equipment is specified as being primarily for 3-6 year olds in all play areas that contain equipment and also for 6-12 year olds in some.
- The proposed location of the crèche is adjacent to a play area with equipment for only 3-6 year olds.
- The active play area marked as for age 12+ is very close to the high voltage power lines and the proposal for it being a ball court is unconvincing.

A decent sized play area should be situated close to the front of the development. Either this play area or the one beside the childcare facility should cater for use by school children both before and after school (e.g. when parents of Junior & Senior Infant kids are hanging around waiting for older kids to

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6 p. 13 Planning & Design Statement - <http://oakleymanor.ie/wp-content/uploads/2018/12/7.-Planning-and-Design-Statement.pdf>

7 In response to opinions expressed by An Bord Pleanála as outlined in Landscape Report <http://oakleymanor.ie/wp-content/uploads/2018/12/1.-Landscape-Report.pdf>



finish up). As mentioned above in relation to the location of the childcare facility, only 3-6 year old play facilities are planned beside the crèche but this doesn't make sense given the likely usage of the childcare facility for children in after school care. Having just one, or at most two, larger play areas within the whole development would seem to be a better option than dispersing random play equipment throughout the development.

The [Celbridge Integrated Services Programme 2016-2020](#) recognised

*"A significant need for a single large (all ages) playground or a spread of smaller playgrounds around the town. In particular play and recreation areas targeting preteens/teens need to be considered."*

and laid out the following **Community Facilities & Amenities** objectives

- Develop existing and new play space targeting preteens/teens
- Consider community facilities and amenities as a central component of town planning

Given lack of progress on these objectives and the dearth of play facilities in the town, play areas and the Active Leisure area in this development will undoubtedly attract people from outside the development. Positioning a larger play area closer to the front of the development would contain movement of people from outside the estate and make it more accessible for the wider community living in the Oldtown area of Celbridge.

Provision for adult play equipment within the development and play space targeted at teens would also be welcomed and in keeping with the needs outlined in the Celbridge ISP. If the developer wishes to engage with us, we can assist with surveying the young people in our town to gauge the most suitable types of play space.

With the removal of the plans for a neighbourhood park in this area of town due to the downscaling of the Oldtown KDA, Celbridge Community Council fears that the amount of residential development provided during the lifetime of this LAP will be maximised at the expense of the future ability to provide an easily accessible neighbourhood park to serve residents from the western side of town. Any future park in the Oldtown area would be set back further from the Shackleton Road if it's built at all.

## Integration of School within Neighbourhood

The strategy for integrating the site reserved for the school into the neighbourhood looks questionable. The design concept for the Oldtown KDA states

*"Site layouts should seek to fully integrate the identified primary school site into the urban structure of the neighbourhood. School buildings should be designed to front onto new streets and spaces so that they contribute to the streetscape and the character of this KDA."*

but having a row of houses "back onto" rather than "face onto" a site for a school wouldn't have the future school fronting onto new streets. There is also scope for this site being put to shared use (school + community facility) and it would be far better if the integration were planned from the start.

Whilst the Department of Education may not have immediate plans for building a school at this location, if the targets for growth in Celbridge during the next decade are realised there will be a need for this site and a marker should be laid down that it will be integrated into the neighbourhood in a

manner the will work well for families attending the school to avoid resistance from residents in the future.

Positioning playgrounds adjacent to schools is a great option so there should be permeability into the site reserved for the school at the play area so school kids could use it whilst waiting to go into school in the mornings and during the hour that junior & senior infants would be hanging around waiting on older siblings.

## Adjoining Roads

The physical works planned for the roads immediately adjacent to the site (the Shackleton and Oldtown Roads) do not go far enough and the **plans miss an opportunity to rectify existing issues with these roads**, for example,

- something could be done to improve the Scoil na Mainistreach school set-down and pick-up arrangements
- the Oldtown Road could be future-proofed for longer term usage & alleviate some of the problems being experience by residents and the nursing home due to the volume of traffic already using it as a rat-run between Celbridge and Maynooth.

## Shackleton Road

Shackleton Road can experience high traffic volumes at peak hours. The junction of Shackleton / Oldtown Roads is particularly busy at school drop-off and pick-up times. Scoil na Mainistreach is opposite the planned Oakley Manor development and, despite the double white lines, children are regularly dropped off for school and picked up along this road with dangerous overtaking of parked vehicles.



Celbridge Community Council welcomes the proposal to include a right turn filter lane on the Shackleton Road for traffic turning onto Church Road (from the Clane Road side). This should assist with some of the delays in the run up to the 09:00 Scoil na Mainistreach starting time. However, we are disappointed to see that there are no proposals to address the lack of set-down infrastructure for Scoil na Mainistreach. The site for the proposed development is the only green field site with potential for rectifying the issue with Scoil na Mainistreach so failing to require a change to the road design here will cement the issue for the long term.



## **Oldtown Road**

Celbridge Community Council welcomes the proposal to widen the Oldtown Road and construct a cycleway adjacent to the development but questions whether adequate width is being allowed for the types of usage this road currently experiences and will experience in the longer term.

There is a preschool 1km out this road which cannot safely be accessed by cyclists or pedestrians. Though too narrow in many places for cars to pass one another safely, this road has become increasingly heavily used by private hire buses and people commuting to/ from Maynooth who wish to avoid heavy traffic both on the Maynooth Road in Celbridge and in Maynooth itself. As the population in this part of town increases, usage such as this is only set to increase especially if alternative routes to/from Celbridge are not constructed.

Entrances to dwellings and the Nursing Home on the Oldtown Road are used for turning and stopping while parents/minders collect children from Scoil na Mainistreach so obstructions for residents, deliveries and ambulances are a regular occurrence.



### 3. Traffic & Transport in Celbridge

Celbridge is a heritage town that grew from a small estate village. It faces the following challenges in relation to movement for commuters and those journeying within the town:

- Many of its roads cannot be altered to prioritise buses or incorporate dedicated cycle paths
- Many school children are too nervous to cycle due to concerns for their safety.
- Celbridge suffers from serious peak-hour traffic congestion due to the volume of traffic that traverses the single bridge over the Liffey every morning and evening.
- The bottleneck at the bridge impacts all bus routes and access to Hazelhatch train station.
- This problem is set to worsen until a second bridge and accompanying road network can be delivered for the town.

#### Traffic in Celbridge

Celbridge is renowned for traffic congestion due to the bottlenecks at the single bridge over the Liffey. The bridge in Celbridge is 200 years old and was not designed for the volume of traffic it is subjected to in the 21st Century.

The M4/N4 is at capacity and regular road traffic accidents on the N4 result in traffic diverting through Celbridge to avoid congestion thus making an already painful delay to cross the bridge in Celbridge unbearable for residents.

Additional road infrastructure is desperately needed currently in Celbridge

- a second bridge further west of the existing one is the most pressing need
- a ring road that facilitates much shorter journey times to Hazelhatch Train Station from as many parts of North Celbridge as possible is essential to encourage a modal shift from private cars to public transport
- a ring road that connects residents from the western part of town to the Maynooth Road for journeys to Maynooth and to access Junction 6 on the M4 is essential to reduce traffic volumes on the Maynooth Road and thus expedite bus journeys along the Maynooth Road

#### Public Transport Service

Access to public transport from the proposed development is inadequate as

- the only buses passing the proposed location for Oakley Manor along the Shackleton Road are
  - 5 morning 67X buses (leaving between 07:10-07:47am Monday-Friday) and
  - 4 evening 67X buses (arriving home in the evenings between 17:45-18:55 Monday-Friday)
- the distance to the closest bus stops for the regular 67 service outside of the times served by the 67X is 1.2km+
- the distance to bus stops on the regional Bus Eireann 120/123 route are 600m but this service
  - is only of use by people destined for the city centre or westwards (Clane & beyond towards Edenderry/Tullamore) – it cannot be used by passengers destined for or needing to interchange at places on the route into Dublin



- is unreliable (this may change under GoAhead but the change may be for the worst!)
- can be hard to avail of at peak times due to capacity issues (especially on the return journey from Dublin City Centre!)
- is costly for anyone who needs to interchange with another mode of transport as Bus Eireann regional routes are not included in [multi-operator fare capping](#) and the BusConnects proposals do not plan to integrate use of regional bus services on the 90 minute fare
- the distance to Hazelhatch train station is 3.5km+ (with ridiculous queues to cross the bridge during peak times - typically 07:30-09:15 and 17:15-18:45) – the Kildare LECP 2016-2021 calls out the challenges in accessing train services ancillary to Celbridge
- all buses (67X, 67, 120/123, feeder bus to Hazelhatch) must queue in congested traffic to cross the bridge as there are no bus prioritisation measures available (nor are these possible with the current infrastructure!)
- the feeder bus service to Hazelhatch would not be a viable option for Oakley Manor residents as
  - it only serves the east and south of the town – the [Planning & Design Statement](#)<sup>8</sup> (p.4) **erroneously states** that a feeder bus serving the Hazelhatch Train Station passes the Shackleton Road frontage
  - the feeder bus service is extremely limited and only serves a small number of trains to/from Hazelhatch
  - the journey time to Hazelhatch on the feeder bus is inconsistent and unpredictable due to traffic congestion meaning that the targeted train service can be missed and resulting in lengthy delays getting to Dublin – a bus journey will be preferred as once the passenger is on the bus there is no uncertainty about the time that will be needed to interchange

## Car Dependency v Public Transport Usage (Oldtown Area)

c.48% of workers from Celbridge work in Dublin city & suburbs and **almost 70% of these rely on cars for their commutes to Dublin**. The commute from Celbridge to work / college is already arduous for many. It takes way longer than the 30-40 minute limit beyond which negative mental health implications can be observed. Celbridge is one of the towns with the highest percentages of commuters who commute for more than an hour (18.6%)<sup>9</sup>. Most residents are already very selective about where they would consider working or studying due to commute times but journeys of 70-75 minutes each way are not uncommon.

This level of car dependency reflects the difficulties that commuters from Celbridge experience availing of public transport services. In a town that is supposed to be part of the Dublin Metropolitan Area, this level of car dependency is ludicrous and is increasingly contributing to deterioration of quality of life for residents of the town. If Celbridge was part of the hinterland region, home buyers would expect lesser access to public transport but Celbridge is considered part of the Dublin Metropolitan Area and is being

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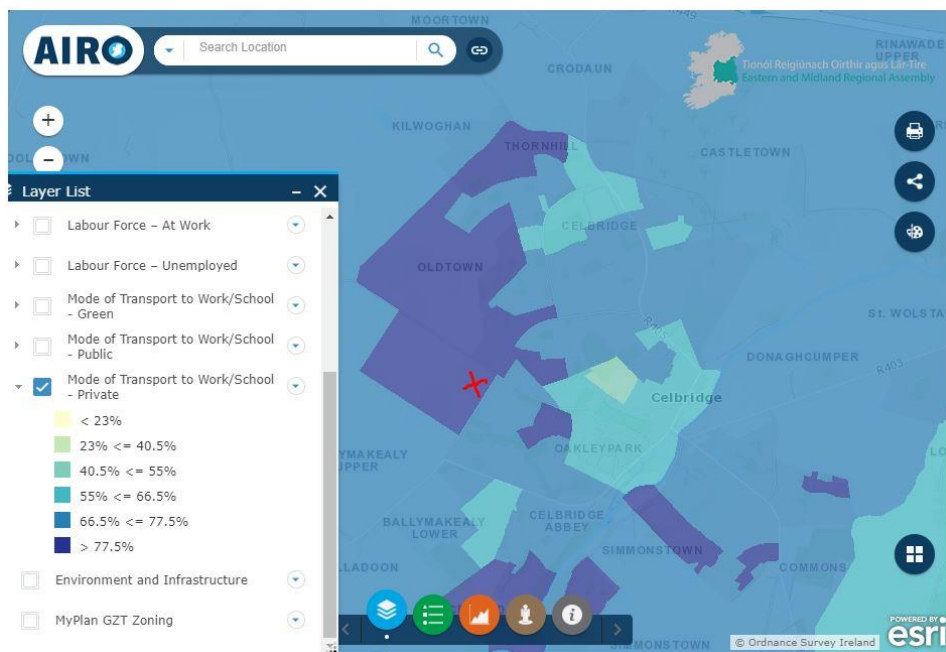
<sup>8</sup> <http://oakleymanor.ie/wp-content/uploads/2018/12/7.-Planning-and-Design-Statement.pdf>

<sup>9</sup> <http://www.cso.ie/en/releasesandpublications/ep/p-cp6ci/p6cii/p6td/>

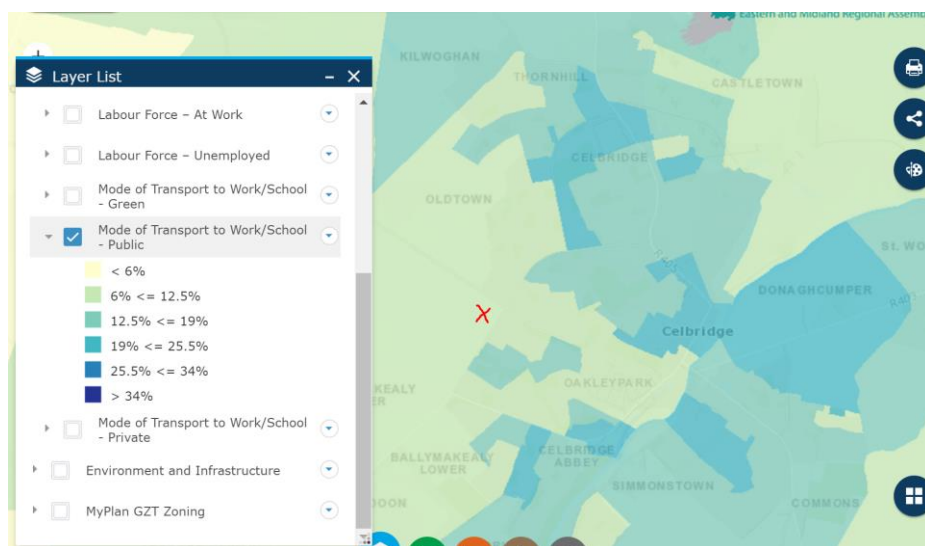
developed aggressively as a centre that can take significant extra population in the next decade so public transport needs to be a key consideration here.

There would be a higher take up of public transport services amongst residents if the services were adequate (in terms of timetables and capacity) and if it didn't take so long to get onto a bus or train in the first place (distance from bus stops / train station, congestion trying to get to them, etc.).

Figures from <http://emra.ie/maps/> support this showing that residents of the part of town in which the site for Oakley Manor is located (marked with a red X in the following images) has the highest rates of private car usage and lowest rates of public transport usage in Celbridge.



Mode of Transport - Private Motor Vehicle



Mode of Transport – Public Transport

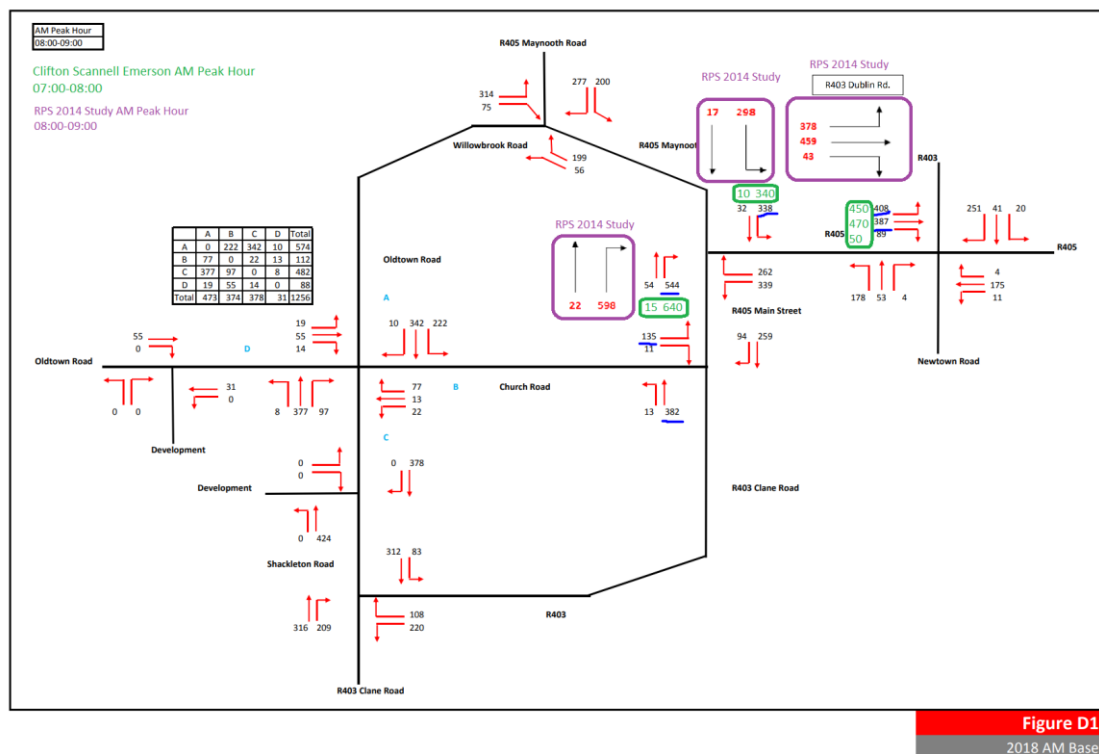


The [Transport Assessment](#)<sup>10</sup> (p.30) considers that **no additional public transport provision will be required to support the proposed development**. It comes to this conclusion after painting a glossy picture of the public transport provision for the area. This doesn't bode well for sustainable living at this location - without better public transport provision, this development will be highly dependent on cars for transport for most things.

## Analysis of Transport Assessment included in Planning Application

The [Transport Assessment](#) commissioned by the property developers is so dense with technicalities that it is difficult to follow how the key findings are arrived at or where the figures are obtained from. It seems high on obfuscation and certainly was not written to be comprehended by persons who are not well versed in transport planning. Celbridge Community Council have had little difficulty following traffic and transport assessments that others have prepared (as these were written with the less technical reader in mind) but feels that this particular assessment fails to communicate its findings in a clear enough manner. We thus have doubts regarding the conclusions it draws based on the analysis and fear that Systra are creatively downplaying the traffic impact expected from the proposed development.

We have compared junction turning counts from this report with those included in reports compiled by others (2014 RPS and 2018 Clifton Scannell Emerson) and note discrepancies especially in volume from English Row (R403) turning onto the bridge. In the figure below, we have superimposed counts from the other traffic studies onto Systra's Network diagram of the **2018 AM Base**.



**Figure D1**  
2018 AM Base





Both the RPS and Systra studies used 08:00-09:00 as peak time but the Clifton Scannell Emerson study recognised that the Liffey bridge in particular is busier before 08:00 – we imagine this is because commuters travelling longer journeys need to leave town at this time to get to their jobs. 08:00-09:00 makes sense as the AM peak for schools traffic but the biggest crunch time for commuters streaming out of Celbridge towards Dublin is before 08:00. Many commuters need to traverse the Liffey bridge and for those heading towards Junction 6 on the M4, both the Maynooth Road and the R449 can be extremely congested before 08:00 (due to the volumes trying to get to Intel in Leixlip and volumes from the north of town trying to get onto the M4). The junction at the east/south of the Liffey Bridge was already noted to be operating above practical capacity in the [2015 feasibility study on options for a new bridge](#)<sup>11</sup> and continues to do so in 2019 with exacerbated queuing (impacting all users of public transport in addition to private car users).

The following figures from [Census 2016 Profile 6 - Commuting in Ireland](#) show that the bulk of movement by school children is between 08:30-09:00 but the bulk of movement by commuters is between 07:30-08:00 and that the number of commuters on the move from 07:00-07:30 is higher than the number of commuters on the move from 08:00-08:30.

	A	B	C	D	E
1	<b>2016 Census Population of Celbridge at Work, School or College with Time Leaving Home</b>				
2	Excludes those who work mainly at or from home				
3					
4	102500 , Celbridge				
5					
6	901 ,Children at school aged between 5 and 12 years		01 ,Before 06:30	1	
7			011 ,06:30 - 07:00	8	
8			03 ,07:01 - 07:30	30	
9			04 ,07:31 - 08:00	109	
10			05 ,08:01 - 08:30	624	
11			06 ,08:31 - 09:00	1723	
12			07 ,09:01 - 09:30	144	
13			08 ,After 09:30	1	2640
14	902 ,Students at school or college aged between 13 and 18 years		01 ,Before 06:30	2	
15			011 ,06:30 - 07:00	22	
16			03 ,07:01 - 07:30	132	
17			04 ,07:31 - 08:00	247	
18			05 ,08:01 - 08:30	833	
19			06 ,08:31 - 09:00	409	
20			07 ,09:01 - 09:30	18	
21			08 ,After 09:30	16	1679
22	903 ,Students at school or college aged 19 years and over		01 ,Before 06:30	6	
23			011 ,06:30 - 07:00	59	
24			03 ,07:01 - 07:30	158	
25			04 ,07:31 - 08:00	193	
26			05 ,08:01 - 08:30	155	
27			06 ,08:31 - 09:00	121	
28			07 ,09:01 - 09:30	64	
29			08 ,After 09:30	109	865
30	904 ,Population aged 15 years and over at work		01 ,Before 06:30	933	
31			011 ,06:30 - 07:00	1365	
32			03 ,07:01 - 07:30	1497	
33			04 ,07:31 - 08:00	1711	
34			05 ,08:01 - 08:30	1293	
35			06 ,08:31 - 09:00	814	
36			07 ,09:01 - 09:30	391	
37			08 ,After 09:30	856	8860
38					



Celbridge Community Council questions the following decision to use 08:00-09:00 as peak hour at the bridge.

- 6.1.4 In agreement with the Council, the turning count data was collected for 3 hours during the weekday AM (07:00-10:00) and PM (16:00-19:00) periods on a neutral day (Tuesday 30/01/2018). The traffic surveys indicated a network peak hour period of 08:00-09:00 in the AM and 17:30-18:30 in the PM.

While the traffic surveys may indicate a network peak hour period of 08:00-09:00 and 17:30-18:30 for Celbridge **as a whole** and/or for the junctions closest to the proposed new development, the morning peak is earlier for Dublin bound traffic crossing the Liffey bridge so Systra's report barely pays lip service to **Kildare County Council's** request that they analyse the impact on traffic levels in Celbridge town centre. Use of the earlier/ busier AM time as peak would be very important to assess the proposed development's impact on traffic at the bridge.

Regarding the following assertion

- 6.3.6 The proposed development's traffic contribution to the R403 Main Street / R403 Hazelhatch Road / R403 English Row priority junction (Site B) and R403 Dublin Road / R405 Hazelhatch Rd E / Newtown Road / R403 Hazelhatch Road W priority junction (Site C) is considered to be negligible in the AM peak period given that it is under 5% during the AM peak hour period.

Celbridge Community Council have noted that the 2019 base figure at each turn is the combined total of outbound and inbound traffic but it's common knowledge that the AM peak issues are caused by the outbound flows of traffic so this approach is questionable.

Celbridge Community Council believes that a Traffic Congestion Formula – i.e.

$$([proposed\ development\ traffic] / [outbound\ traffic\ at\ the\ bridge]) \times 100$$

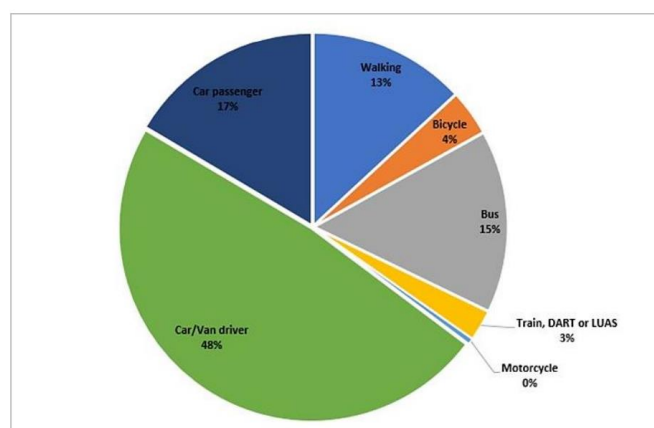
would give a more accurate reflection of the proposed development's contribution to traffic than the Traffic Level Formula they used– i.e.

$$([proposed\ development\ traffic] / [all\ traffic\ at\ the\ bridge - both\ directions]) \times 100$$

It is primarily outbound traffic that the proposed development would generate during AM peak times so the analysis needs to focus on this.

Systra have relied upon the **2016 Census Mode Share for Journey to Work and School or College** figures for the whole of Celbridge to determine how many journeys from the proposed development will be vehicle trips.

Given our belief that the AM peak time for traffic at the bridge is 07:00-08:00 and this is not a time when many children will be travelling to school, the walking and bicycle mode share will be significantly lower before 08:00.



Source: Ireland's 2016 Census

Figure 4.1 2016 Census Mode Share for Journey to Work and School or College

Regarding the threshold for a detailed junction assessment, Celbridge Community Council feels that the impact from the proposed development is close enough to the 5% threshold to merit a more detailed assessment.

### 6.3 Threshold Assessment

- 6.3.1 A threshold assessment was carried out for each of the existing junctions within the identified area of influence (development access junctions excluded). It has been assumed that a percentage impact of 5% or greater at any junction in the study area would trigger the requirement for a detailed junction assessment for the junctions at Sites 1, 2 and 3 to provide a robust assessment. This is in line with TII<sup>2</sup> and DoEHLG<sup>3</sup> guidance which states that a traffic assessment is necessary if development traffic exceeds 5% of total traffic at a location where congestion exists.

2019 AM Peak Period

Arm	2019 Base	Dev Flow	2019 Base + Dev	% Impact from Base	Total Impact at Junction
Shackleton Rd / R403 Clane Rd E / R403 Clane Rd S - Signalised					
Shackleton Rd	835	18	853	2.2%	1.4%
R403 Clane Rd E	632	15	647	2.4%	
R403 Clane Rd S	1078	3	1081	0.3%	
Oldtown Rd N / Church St / Shackleton Rd / Oldtown Rd W - Signalised					
Oldtown Rd N	1068	48	1116	4.5%	6.7%
Church Rd	496	37	533	7.5%	
Shackleton Rd	877	73	950	8.3%	
Oldtown Rd W	121	12	134	10.1%	
R405 Maynooth Rd N / R405 Maynooth Rd S / Willowbrook Rd - Signalised					
R405 Maynooth Rd N	1010	33	1043	3.2%	2.9%
R405 Maynooth Rd S	541	0	541	0.0%	
Willowbrook Rd	736	33	769	4.5%	
R403 English Row / R403 Clane Rd / Church Rd					
R403 English Row	887	35	923	4.0%	3.9%
R403 Clane Rd	678	5	683	0.8%	
Church Rd	258	30	288	11.7%	
R403 Main Street / R403 Hazelhatch Rd / R403 English Row					
R403 Main Street	1200	35	1234	2.9%	3.3%
R403 Hazelhatch Rd	1513	43	1556	2.8%	
R403 English Row	956	43	999	4.5%	
R403 Dublin Road / R405 Hazelhatch Rd E / Newtown Rd / R403 Hazelhatch Rd W					
R403 Dublin Road	793	17	810	2.2%	2.4%
R405 Hazelhatch Rd E	613	18	631	3.0%	
Newtown Rd	384	4	388	1.1%	
R403 Hazelhatch Rd W	1518	40	1558	2.6%	

40 vehicles that originate in the proposed development are estimated to cross the Liffey bridge between 08:00-09:00.

Celbridge Community Council expects car dependency to be higher in the proposed development than other better positioned locations in town so believes 40 to be too conservative.

Celbridge Community Council also expects the number to be higher between 07:00-08:00.

834 of the 1518 vehicles crossing the bridge are crossing from Main St or English Row.

If 45 vehicles originated in the proposed development then  $(45/834) \times 100 = 5.4\%$

Celbridge Community Council are not in a position to second guess transport modelling outputs but based on our knowledge of human behaviours from residents of the Oldtown area of town, can question the inputs used in Systra's modelling. Much comes back to the need for an impartial Transport Management study which can be a comparative benchmark for all developer commissioned studies.

Celbridge desperately needs strategic thinking and a clear framework for how transport infrastructure will support the sustainable growth and development of the town. Until an impartial analysis of the transport problems has been performed and the accompanying recommendations have been incorporated into the LAP, Celbridge needs protection from piecemeal development motivated by commercial gain where the developers have a clear agenda of downplaying the impact that their development will have on traffic in the town. Isolated transport assessments carried out on a development-by-development basis are not strategic enough.



## 4. Needs Identified for Celbridge

The Department of Housing, Planning, Community and Local Government [raised concerns in a February 2017 letter to Kildare County Council](#)<sup>12</sup> during preparation of the Celbridge Local Area Plan 2017-2023 and specifically advised Kildare County Council to take a number of actions. This letter will be referred to multiple times below.

### Strategic Transportation Plan

**NEED:** An action item (1.1.2) was included in the [Kildare Local Economic and Community Plan \(LECP\) 2016-2021](#)<sup>13</sup> for a “**strategic Land Use and Transportation Study of north east Kildare** including the Metropolitan area towns of Leixlip, Maynooth, Celbridge and Kilcock to inform the strategic development of this area” to be carried out in 2017. This action item was to meet the objective (1.1) of providing infrastructure and services that keep pace with sustained population growth and facilitate a high quality of life for all residents.

**RESPONSE:** To date, Celbridge Community Council is unaware of any progress on a North East Kildare Land Use & Transportation Study.

**NEED:** The Department of Housing, Planning, Community and Local Government expressed concern to Kildare County Council regarding how it plans to ensure that new development is clearly phased on the basis of the timely delivery of identified new strategic infrastructure for the overall town including Strategic road network and bridge infrastructure over the River Liffey that addresses the acknowledged congestion problem in the town and the additional traffic generated from new development.

**RESPONSE:** Kildare County Council responded to the concerns raised by the Department and others regarding the need for a strategic road network and bridge infrastructure by introducing an objective (MTO3.1<sup>14</sup>) into the LAP to prepare a **Transport Management Plan** and **Public Transport Strategy** within 12 months of the date of adoption of the Celbridge Local Area Plan 2017-2023.

- The Transport Management Plan and Public Transport Strategy were due to be delivered in August 2018 but this did not happen. This is now almost 6 months overdue.
- All public transport strategy is being rolled into the NTA’s **BusConnects** project but that project is being progressed in a “broad strokes” manner at Dublin Metropolitan Area level. It was clear from the report that was produced<sup>15</sup> and from a number of conversations with the NTA that the needs of North Kildare had not been analysed in any great depth. Since the network redesign has returned to the drawing board and decisions for North Kildare are

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<sup>12</sup> <http://www.kildare.ie/CountyCouncil/Planning/DevelopmentPlans/LocalAreaPlans/CelbridgeLocalAreaPlan2017-2023/1.%20Minister%20for%20Hsg%20Planning%20Comm%20%20Local%20Gov.pdf>

<sup>13</sup> <http://www.kildarelccldc.ie/wp-content/uploads/2016/01/Kildare-LECP-2016-2021.pdf>

<sup>14</sup> **MTO3.1:** To seek to prepare, within 12 months of the date of the adoption of the Celbridge Local Area Plan, 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, vehicle movement and links to the railway stations in consultation with statutory agencies, key stakeholders and the local community. Upon completion, the recommendations of the TMP shall be integrated into the LAP by way of a statutory amendment, where appropriate

<sup>15</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>



being deferred until the design for the whole of the Dublin area is reworked, it is as yet unclear to what degree the NTA will promote public transport for Celbridge. It remains to be seen whether a modal shift from private cars to public transport can be expected in Celbridge – i.e. whether services will

- serve more passengers through improved routes,
  - be reliable enough,
  - be frequent enough, etc.
- Kildare County Council are working on a plan to improve safety for vulnerable road users at the existing bridge and to introduce changes to traffic flow to try buy some time until a second bridge can be constructed. The scope of this work may have extended to an entire Transport Management Plan but we are not aware of Kildare County Council's intentions here
  - Celbridge Community Council expected the recommendations from the Transport Management Plan to be integrated into the Local Area Plan in the projected timeframe. When this did not materialise, we expected that it would be produced before any significant development would be permitted. Ignoring the need for a Transport Management Plan and Public Transport Strategy and allowing bolt-on developments in an ad hoc manner will exacerbate the already significant issues.
  - Celbridge Community Council questions the rationality of allowing development on this scale to proceed in Celbridge until the gravity of the concerns raised by the Department are satisfactorily addressed by Kildare County Council and the NTA.

## Consolidate Development

**NEED:** The Department of Housing, Planning, Community and Local Government expressed concern to Kildare County Council about its plans to zone for residential development on the western periphery of Celbridge and advised Kildare County Council to delete proposed residential zonings on the western periphery of Celbridge.

**RESPONSE:** Kildare County Council significantly reduced the size of the Oldtown KDA in response to the Department's concerns about the peripheral location of the site relative to services but in so doing removed the following which would have been a great boost for this part of town:

- objective to construct a Western Outer Link Road to relieve congested roads town (link road was to connect from the Clane Road and come out on the Maynooth Road close to Junction 6 on the M4) and
- local retail units of a scale appropriate to a local centre (500-1000 sq m retail/commercial)
- neighbourhood parks providing for both passive and recreational activities including a multi-use games area

and ensured that development at this location would proceed in a piecemeal fashion without the benefit of strategic planning.



## Implementation and Infrastructure Delivery

**NEED:** The Department of Housing, Planning, Community and Local Government expressed concern to Kildare County Council about its plans to phase delivery of new strategic infrastructure relative to delivery of new residential development. The Department advised Kildare County Council to include an **Implementation and Infrastructure Delivery Schedule** in the LAP.

**RESPONSE:** Kildare County Council did not include an **Implementation and Infrastructure Delivery Schedule** in the LAP and, while funding might be applied for under the **Urban Regeneration and Development Fund** going forward, it is still unclear to us whether Kildare County Council intends to prioritise Celbridge for infrastructural investment at all. Kildare County Council indicated that they would look at preparing a Special Development Contribution Scheme under Section 48 / Section 49 of the Planning and Development Act 2000 to support the preparation and implementation of the Transport Management Plan. A plan for funding the delivery of infrastructure would reassure existing residents of the town that the overall town may benefit from the new residential development by virtue of the infrastructural enhancements that would accompany/precede it.

Celbridge Community Council is not aware of any progress on a Special Development Contribution Scheme. The developer of these 251 dwelling units won't be able to afford to build a second bridge for the town. Neither will the developer of any single one of the other developments that will happen around the town in the coming years. However, the combined contributions of many developers should make some impression on rectification of infrastructural deficits in Celbridge which are on such a scale that the source of funding really needs to be taken seriously.

## Water Supply and Waste Water Infrastructure

**NEED:** The Department of Housing, Planning, Community and Local Government expressed concern to Kildare County Council regarding how it plans to ensure that new development is clearly phased on the basis of the timely delivery of identified new strategic infrastructure for the overall town including required water supply and waste water network infrastructure that can service the new residential zonings of the LAP.

**RESPONSE:** Kildare County Council responded to the concerns raised by the Department by highlighting that Irish Water "is now the responsible body for the operation of public water services" and while "Kildare County Council intends to work in close collaboration with Irish Water in ensuring the satisfactory delivery of Irish Water's Service Programme as it relates to Kildare including Celbridge" the message was that responsibility lies with Irish Water. Recent water supply outages raise the question of how well Irish Water and Kildare County Council are collaborating.

## Robust and Resilient Water Supply Infrastructure

**NEED:** The public were recently (6<sup>th</sup> - 7<sup>th</sup> January 2019) irate when, for the second time in 6 months, thousands of residents were without water after a mains pipe burst. The outage lasted for about 36 hours and affected an estimated 10,000 residents – some additional residents did benefit from a diverted water supply but this was totally incapable of supplying the whole of the North & West of town. The alternative source was incapable of feeding water to the west of town where the proposed Oakley Manor development is due to be built. The same issue occurred





only 6 months ago in July 2018 close to the site of the January 2019 burst so it's clear that the water supply infrastructure is not being prioritised.

**RESPONSE:** No concrete measures have been made known to residents of Celbridge regarding plans to improve resilience in the water supply network. While Irish Water may claim that the water network is capable of supplying the water to new estates, as they have done in the case of this planning application, there will always be burst pipes or maintenance and, if most of the North and West of Celbridge (c. 16,000 people) lose water supply in these events, this is unsatisfactory. The water supply infrastructure is both fragile and lacks the resilience to divert water from another supply. It's a very basic requirement of water supply systems that the layout should be such that no consumer is without water supply during repair of any section of the system. Building resilience into the mains water supply network should be a pre-condition of this development.

## Deficits in Social Infrastructure in Celbridge

The Kildare LECP 2016-2023 highlighted that a need for a Family Resource Centre has been identified for Celbridge. Additionally, the Celbridge Integrated Services Programme Plan (ISP) 2016-2020 identified a number of objectives including the following

Area	Goal	Objective
<b>Children &amp; Young People</b>	The goal relating to children and young people is to increase the range of service and supports available to children and young people in Celbridge to enable them to reach their full potential.	3. Extend youth provision through the expansion of services and recreation facilities for young people in Celbridge for teenagers to develop.
<b>Health</b>	The goal relating to health is to promote 'healthy Celbridge' by increasing the provision and access to health services and supports within the community	10. Increase affordable transport options to hospital.
<b>Community Facilities &amp; Amenities</b>	The goal relating to community facilities and amenities is to support the ongoing use and development of facilities and amenities in Celbridge for use by the local community.	18. Develop existing and new play space targeting preteens/teens 19. Consider community facilities and amenities as a central component of town planning
<b>Infrastructure &amp; Transport</b>	The goal is to plan, develop and maintain Celbridge to have the infrastructure and transport to enable it to be a dynamic sustainable town.	35. Increase access to and reduce the cost of public transport to and from main towns and Dublin Metropolitan area 36. Promote the development of high quality cycle lanes and walking opportunities 37. Work to address issues that exists in relation to parking, pathways and lighting

None of these objectives are "made up" – they reflect very real needs for the residents of Celbridge and need to be given serious consideration when planning is being granted.