



3 February 2017

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

Submission on Draft Celbridge Local Area Plan 2017-2023

Dear Sir / Madam

Celbridge Community Council was established as a voluntary community group in 1975 and has for over forty years been actively involved in many aspects of community life in Celbridge. Our goal is to promote and improve community life and to influence in a positive way the physical development of the area for the benefit of all those who live and work there.

As a voluntary group, Celbridge Community Council welcomes the opportunity to make a submission on the Draft Celbridge Local Area Plan 2017-2023.

In this submission, comments will be grouped under headings reflecting the chapters of the Draft Celbridge Local Area Plan. Celbridge Community Council wishes to promote the following themes in this submission:

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

In reviewing the Draft Celbridge LAP, we observed a number of typographical errors and factual inaccuracies but felt that inclusion of these in the main part of our submission might detract from our message so we have included these details in an appendix.



Celbridge Community Council



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2. Celbridge in Context

2.2 Spatial Planning Context (p.8)

Moderate Sustainable Growth Towns are defined as follows in the Greater Dublin Area Regional Planning Guidelines¹

Moderate Sustainable Growth Towns in the Metropolitan area are strong district service centres with high quality linkages. They will continue to have a strong role as commuter locations and growth needs to be based on and related to the capacity of high quality public transport connections and the capacity of social infrastructure.

Celbridge Community Council wishes to emphasise that, on account of its large population, Celbridge represents an anomaly amongst the 15 towns in the Greater Dublin Area that have been designated as “Moderate Sustainable Growth Towns”². The population of Celbridge is almost as high as Newbridge and Naas in County Kildare and towns such as Athlone, Portlaoise, Mullingar, Wexford and Letterkenny in the rest of the country. The population of Celbridge actually exceeds the populations of a number of administrative county towns such as Sligo and Tullamore.

Despite its scale, Celbridge suffers from notable deficits in physical and social infrastructure and it benefits from neither high quality linkages nor a high quality public transport service.

We draw attention to the “**Settlement Typology and Hierarchy**” in **Table 8** of the **Greater Dublin Area Regional Planning Guidelines** and the fact that “Moderate Sustainable Growth Towns” are listed in the 5th tier so the proposed housing and population targets for Celbridge cannot at any stretch be described as being on a “sustainable scale in line with natural increase, growth in economic activity in the area and the quality and capacity of public transport available to existing and future populations”.

It is critical in developing settlement strategies in future Development Plans that Councils have due regard to the hierarchy of towns in the table, and carefully consider the phasing of housing land to ensure that towns grow at a suitable and sustainable scale, appropriate to their position in the hierarchy. Distribution of future population should be directed towards the upper 4 tiers in the hierarchy, and any upward revisions to housing and population targets need to be targeted to these growth towns. Towns in the lower tiers should grow at a sustainable scale in line with natural increase, growth in economic activity in the area and the quality and capacity of public transport available to existing and future populations.

Table 8: Settlement Typology and Hierarchy

Hierarchy	Description	Locations
Gateway Core	International business core and high density population, retail & cultural activities.	Dublin City Centre & immediate suburbs
Metropolitan Consolidation Towns	Strong active urban places within metropolitan area with strong transport links	Swords, Blanchardstown, Lucan ²⁵ , Clondalkin ²⁶ , Tallaght, Dundrum, Dun Laoghaire, Bray ²⁷ .
Large Growth Towns I	Key destinations, economically active towns supporting surrounding areas, located on Multi Modal Corridor in metropolitan hinterland.	Navan, Naas, Wicklow, Drogheda ²⁸
Large Growth Towns II	Smaller in scale but strong active growth towns, economically vibrant with high quality transport links to larger towns/city	Newbridge, Greystones, Cherrywood, Arklow, Balbriggan, Dunboyne, Maynooth, Leixlip. ²⁹
Moderate Sustainable Growth Towns	(i) In Metropolitan area, strong edge of metropolitan area district service centres, high quality linkages and increased densities at nodes on public transport corridors (ii) In Hinterland areas, 10k from large town on public transport corridor, serve rural hinterland as market town	Donabate, Celbridge, Lusk, Rush, Ashbourne, Kells, Trim, Dunshaughlin, ³⁰ Kildare, Monasterevin, Kilcullen, Kilcock, Athy, Newtownmountkennedy, Blessington.
Small Towns	Good bus or rail links; 10k from large growth towns.	To be defined by Development Plans.
Villages		To be defined by Development Plans.

¹ <http://emra.ie/dubh/wp-content/uploads/2015/02/Greater-Dublin-Area-Regional-Planning-Guidelines-2010-2022-Volume-I.pdf>

² 2011 Census figures give the following populations for Moderate Sustainable Growth Towns in the Greater Dublin Area - Celbridge (19,537), Ashbourne (11,355), Athy (9,926), Rush (9,231), Trim (8,268), Kildare (8,142), Lusk (7,022), Donabate (6,778), Kells (5,888), Kilcock (5,533), Blessington (5,010), Dunshaughlin (3,903), Monasterevin (3,710), Kilcullen (3,473), Newtownmountkennedy (2,410)



3. Vision for Celbridge

3.1 Strategic Vision (p. 9)

While acknowledging that the plan for Metropolitan urban areas (Maynooth, Leixlip, Celbridge, Kilcock) is to build critical mass, Celbridge Community Council reiterates that the rate of growth projected for Celbridge (46% increase in dwelling units over 9 years) in the Draft Local Area Plan cannot be described as sustainable and that a lot more needs to happen in parallel with population growth of this scale.

On its own merits, the strategic vision appears sound; however it does not correlate with the magnitude of the “plan” as outlined in the rest of the document. The “plan” is for

- A dramatic increase in commuters needing to travel out of Celbridge for employment. These workers will not have
 - quality employment opportunities close enough to avoid a commute
 - accessibility to high quality public transport
 - accessibility to a road network that has been designed to prevent huge delays for them as they attempt to get out onto national roads.

The level of car dependency will impact negatively on the environment through increased energy usage and emissions. Additionally, the stress and frustration of gridlocks will impact negatively on commuters’ wellbeing

- Large-scale residential growth with a phased implementation plan which, in light of current deficits, does not deliver open space, recreational facilities and amenities at a fast enough rate.

The town already suffers significant problems with its lack of facilities. Teenagers in particular are side-lined and the proposed rate of growth without redressing existing deficits risks exacerbating the anti-social behaviour issues that affect the town

Enhancement and growth of non-residential elements are not convincingly stated in the LAP.

On the basis that simply stating "to support quality of life" is lacking in ambition, we suggest a slight rewording of the Strategic Vision to say "to support and enhance quality of life" – i.e.

*To promote the sustainable growth of Celbridge as a Moderate Sustainable Growth Town, recognising its strategic position In North Kildare within the Metropolitan area of Dublin. In this context, the plan will seek to support population growth that is based on the capacity of physical and social infrastructure in a plan led approach; to support **and enhance** quality of life for existing and future populations, to protect and enhance the significant built and natural heritage assets of the town; to support economic development that is based on local strengths including heritage and tourism; to promote sustainable movement and identify opportunities to enhance connectivity; and to identify opportunities for the delivery of supporting infrastructure, facilities and amenities.*

With reference to the proposed National Planning Framework Ireland 2040 strategy³, Celbridge Community Council requests that Kildare County Council plan to revise the growth estimates for Celbridge as a variation to the Local Area Plan in line with the proposed new strategy. If a decision is made under the National Planning Framework that Celbridge will continue to grow on the currently proposed trajectory then hopefully exchequer funding will be made available to rectify infrastructural deficits.

³ <http://npf.ie/about/>



3.2 Strategic Objectives (pp. 9-10)

Celbridge Community Council notes that the phrase “in tandem with” permeates the Draft LAP in relation to provision of infrastructure, facilities and amenities. Given the existing deficits, as noted in the ISP Celbridge Plan 2016-2020⁴ (see Appendix B of this document for the list of ISP research findings), we are not convinced that “in tandem with” is an adequate term and suggest rewording to something stronger like “as a prerequisite for”. Inclusion of a reference to an objective from Section 7.3 of the ISP Celbridge Plan 2016-2020 would be helpful. We propose changes to this strategic objective along the following lines:

To support and facilitate the development of high quality, integrated residential neighbourhoods and deliver social and community infrastructure and facilities ~~in tandem with~~ as a prerequisite for new housing in line with the ISP Celbridge Plan 2016-2020 objective to consider community facilities and amenities as a central component of town planning.

Celbridge Community Council notes that “North Kildare Economic Cluster” is mentioned in the objective on promoting and supporting economic development and in other parts of the Draft LAP (4.3 Employment, 7 Economic Development) but there is no reference to a strategy for this economic cluster. The broad concept of what is intended for this economic cluster comes from the Greater Dublin Area Regional Planning Guidelines – the most specific it gets is as follows:

This cluster has already established synergies between the education sector (NUI Maynooth) and major employers (The C-Set approach may further enhance this). Building upon this, the focus of employment cluster activity should be within the hi-tech/bio tech sectors, research and development, ICT and manufacturing- all of which should be used to brand the cluster as a centre of excellence in the knowledge based economy.

Most references to the North Kildare Economic Cluster in the Draft LAP lack intention. If a strategy does exist then it should be interwoven into the LAP. If no strategy currently exists then an objective needs to be added committing to defining one.

Celbridge’s heritage and tourism assets are identified as being key economic strengths. They will only remain so if they are protected from the negative impacts of residential development that are poorly phased in respect to essential infrastructure.

It is imperative for tourism development that the estate village charm of the town centre is restored and that the main street is invigorated. This represents a significant challenge in light of existing traffic problems that will worsen significantly without ironclad protection. We suggest the following changes to the objective relating to economic development:

To promote and support economic development that is consistent with ~~the role of Celbridge as a Moderate Sustainable Growth Town. The town’s location in the North Kildare Economic Cluster and its heritage and tourism assets are identified as key economic strengths~~ Celbridge’s location in the North Kildare Economic Cluster and the ISP Celbridge Plan 2016-2020 objectives for development of key tourist sites and a Celbridge Tourism and Heritage Strategy. Training and employment will be encouraged in particular in the knowledge based economy in line with the vision for the North Kildare Economic Cluster but also in any sector consistent with the role of Celbridge as a Moderate Sustainable Growth Town. The safeguarding of Celbridge’s ability to develop as a key tourist destination will underpin all planning decisions for the town.

In the interests of

- protecting established residential areas from through traffic,
- ensuring access to key resources for populations living on both sides of the river, and
- on the basis that the 2015 Celbridge River Crossing Feasibility Report concluded “that an additional river crossing is required to be operational in Celbridge in the near future (2019)” based on a less aggressive population growth than is forecast by the Draft LAP,

⁴ <http://www.kildarelcdc.ie/wp-content/uploads/2012/07/ISP-Celbridge-Plan-2016-2020.pdf>



we suggest the following additions to the strategic objective relating to the transport network:

To enhance the existing transport network by increasing permeability and connectivity for pedestrians, cyclists and vehicles, in order to provide access to key land uses such as community facilities, public transport nodes, strategic open spaces and the town centre, as well as the crossing of the River Liffey with priority being given to a new vehicular bridge in the near term as per the conclusions of the 2015 Celbridge River Crossing Feasibility Report. These enhancements will prioritise the preservation of existing residential roads free from rat runs to ensure continued safety and tranquillity where through traffic was never an objective in the original design for the housing area.

On the basis that infrastructural provisions remain a barrier to realising the potential that Celbridge's expansion can play in the vision handed down from the Regional Planning Guidelines, we suggest rewording the following objective to include "in advance of new development"

To enhance the infrastructural assets of Celbridge in advance of new development to ensure the town is well positioned to accommodate growth.

We suggest rewording the following objective to include the overarching objective that our green infrastructure is made accessible for members of the community to enjoy

To protect and enhance Green Infrastructure assets and create an interconnected network of parks, open spaces, demesne lands and watercourses in Celbridge ensuring that all members of the community can access them at a convenient distance from their homes and places of work.

In the interests of provision of infrastructure not being deferred for lengthy periods of time to the detriment of the occupiers, we suggest the addition of additional information in the objective related to phasing. This may appear to be implementation detail but if applications for these Key Development Areas are submitted straight to An Bord Pleanála, calling things like this out as strategic objectives will be beneficial.

To phase new development to ensure that it occurs in an orderly and efficient manner in accordance with proper planning and sustainable development. Provision of all infrastructure required by town centre extension Key Development Areas will be enforced prior to commencement of any commercial or residential development on the sites and provision of infrastructure for the residential Key Development Areas will be enforced in pro-rata portions with each portion relating to at most 50 houses being completed before construction can commence on the next 50 houses.



4. Compliance with Core Strategy

4.1 Function, Population and Scale of Celbridge (p. 11)

Recognising that the County Development Plan (CDP) and the Local Area Plan (LAP) need to be read in tandem to fully interpret the objectives for Celbridge and, with respect to the following:

The Core Strategy of the draft CDP 2017-2023 allocates 10% of Kildare's housing growth to Celbridge over the period 2017-2023, out of a total housing allocation of 32,497 units for the County. Table 3.3 of the draft CDP identifies a housing unit target of 10,333 units for Celbridge to the year 2023, through the addition of 3,250 housing units over the Plan period. This represents an overall target population for the town of 22,801 persons.

we are hopeful that the erroneous population figures for Celbridge in Table 3.3 of the Draft County Development Plan have been rectified on the back of submissions on material amendments to the Draft CDP made by us (and presumably others!) in November 2016.

Table 3.3 Settlement Hierarchy – Population and Housing Unit Allocation 2016-2023

Settlement Type	Towns / Villages	2011 Pop Census	2016 Pop Est.	2011 Dwellings	2016 Dwellings Est.	Allocated Growth (%) 2016-2023	New Dwellings Target (units) 2016-2023	2023 Dwellings Forecast	2023 Pop Forecast
Large Growth Town I	Naas*	20,713	21872.928	7685	7877.125	14.90%	4,768 4,842	12,719	28,111
	Large Growth Town II	Maynooth**	12,510	13210.56	4923	5046.075	10.90%	3,488 3,542	8,588
Leixlip		15,452	16317.312	5506	5643.65	7.00 10.20%	2,240 3,315	8,958	19,794
Newbridge		21,561	22768.416	8216	8421.4	11.60%	3,712 3,770	12,191	26,896
Moderate Sustainable Growth Towns (6)	Celbridge	19,537	20631.072	6911	7083.775	13.2 10.00%	4,224 3,250	10,333	22,801
	Kilcock**	5,533	5842.848	2160	2214	4.00%	1,280 1,300	3,514	7,764
	Kildare	8,142	8597.952	3263	3344.575	4.70%	1,504 1,527	4,872	10,750

For the benefit of the Draft LAP, we will reiterate the point that the population projections for 2023 do not add up.

A	Estimated Population in 2016	20,631
B	New dwelling unit target up to 2023	3,250
C	Population Forecast for 2023	22,801
D	Population increase between 2016 and 2023	2,170

If 3,250 dwelling units are built by 2023, then population increase would be expected to be in the range of 6,500 to 9,425 persons from occupants of the new dwelling units. This range is based on an average occupancy rate per dwelling unit of 2 to 2.9 persons. The natural increase (birth rate - death rate) in the town's population over 6 years might be expected to increase the population by an additional 1,000 so the 2023 population forecast figure should be between 28,131 and 31,056.

Lower end of range with just 2 occupants per dwelling:	28,131 [20,631 + 6,500 + 1,000]
Upper end of range with 2.9 occupants per dwelling:	31,056 [20,631 + 9,425 + 1,000]

We ask that the correct population forecast for 2023 be included in the Local Area Plan along with an explanation of how the figure was arrived at. The LAP needs to provide this information if the document is to be treated as credible.

As the third largest and second most densely populated town in Co. Kildare, the significance of growth at these levels is huge and to ensure the right supports for the town, it is important that Celbridge is not portrayed in a way that obscures the reality of its size, rate of growth and density of population.



During our analysis, we came to the conclusion that there could be any number of reasons which contribute towards the population projections being lower than one might expect for the number of dwelling units, for example:

- a significant decrease in the average number of occupants per dwelling across the entire housing stock in Celbridge could account for some of the discrepancy.
- though completed, a significant number of new dwelling units may not yet be inhabited in 2023
- a pragmatic adjustment to the GDA RPG's population growth targets has been made in light of the reality in post-recession Ireland informed by CSO figures
- a mistake has been made in the document and there is in fact an implicit expectation for significant population growth between 36%-50%

For what it's worth, our analysis is as follows:

What is clear is that

- growth targets have been allocated to counties and settlements based on the RPG targets and RPG policy requirements.
- the RPG target for dwelling unit completions in Co. Kildare to the end of April 2023 is 32,497
- a 10% share of this (3,250) has being allocated to Celbridge.

Here are the figures that do not make sense:

- the increase in housing stock is projected to be 46% (3,250 units => increase from 7,084 -> 10,333)
- the increase in population is projected to be 10.5% (2,170 persons => increase from 20,631 -> 22,801)
- leaving any natural increase aside, with 3,250 dwelling units and
 - an average occupancy rate of 2.9 persons per dwelling unit (this is the Co. Kildare average and Celbridge is actually higher!), the population would rise to 30,056 (an increase of 9,425 persons).
 - a very conservative average occupancy rate of 2 persons per dwelling unit (if a large number of dwellings were for single people but it is not clear that this is the case), the population would rise to 27,131 (an increase of 6,500 persons)

Natural increase would add about another 1,000 to town's population during the timeframe of the Local Area Plan.

We base the most plausible theory we can come up on the Draft County Development Plan statement that the rate of completions that would be required to meet the growth targets is very high when compared with historic completion rates in Co. Kildare but that the growth targets should be achievable by **2026** - i.e. it states:

It is considered that the growth allocations for each Town, Village and Settlement, as set out in Table 3.3 incorporates an inbuilt headroom to meet anticipated need and to ensure continuity of supply of zoned lands over the 9 year period from 2017 to 2026 and beyond, in accordance with the requirements of the Development Plan Guidelines, DECLG, 2007. This approach is supported by the population growth forecasts published by the CSO in 2013 and preliminary Census results published in July 2016.

Is it the case that

- an extension beyond April 2023 to 2026 for completion of the RPG targets (3,250 dwelling units) is being planned for?
- the expectation is that roughly 2/3 of the 3,250 dwelling units allocated to Celbridge (i.e. 2,167) be completed by 2023 and the remaining 1/3 by 2026?
- Kildare County Council erroneously added 2,170 to 20,631 (i.e. **used the figure for dwelling unit increase rather than a projected population increase calculated from it**)?
 - If this is the case, we could extrapolate that the population increase by 2023 would be 6,293 (2,170 x 2.9 occupancy rate) => population size of **26,924** (20,631 + 6,293)



Table 4.1 Estimated Residential Capacity (p. 12)

We would like to put forth suggestions for updates to this table.

- Update the “Estimated Density” column in Table 4.1 to indicate the range of densities as detailed in the “Built Form” section in the design brief for each Key Development Area detailed in Section 12.2 – indicates that densities at the higher end of these ranges may be achievable where the quality of design and layout is particularly high. By including the ranges in table 4.1, the LAP will present a clearer “at a glance” picture of what is intended for each KDA
- Indicate units of measure for quantum of land (hectare) and capacity (dwellings)
- Removal of KDA 2 as a location for residential development

Location of Development	Quantum of Land for Housing (ha)	Estimated Residential Capacity* (dwellings)	Estimated Density
KDA 1 St Raphael’s: Town Centre Extension	9	100**	Mixed use site
KDA 2 Donaghcumper: Town Centre Extension	6.40	450**	Mixed-use site 0
KDA 3 Ballyoulster: New Residential Area	29.5	885	30-35
KDA 4 Oldtown: New Residential Area	47.5	1425	30-40
KDA 5 Crodaun: New Residential Area	15	450	25-30
KDA 6 Simmonstown: New Residential Area	13.1	393	30-35
Other sites	8.5	255	30
TOTAL	129 122.6	2,658 3,508	30

4.2 Retail Development

In light of the two town centre extensions proposed in KDA 1 and KDA 2, it would greatly help the LAP to see an analysis of why the large convenience retail premises (former Spar) has not been put to another successful use and why Celbridge frequently sees new retail premises fail.

The analysis should be carried out to examine how the town centre expansions will make any difference to the situation – is the existing town centre missing something crucial that can be provided by these extensions?

4.3 Employment

The LAP should translate sections of Chapter 2 from the CDP relating to employment so the local employment strategy for Celbridge is clearer. As the economic climate improves, it is imperative that the strategy for supporting, maintaining and improving a sustainable economic base is clear. This should include a strategy on maintaining existing jobs and creating new employment opportunities.

The following statement is unclear on what it means for Celbridge to be a part of the North Kildare Economic Growth Cluster or to be linked to the Primary Economic Growth Towns of Maynooth and Leixlip.

Celbridge is part of the North Kildare Economic Growth Cluster and linked to the Primary Economic Growth Towns of Maynooth and Leixlip. Celbridge will continue to benefit from its proximity to the Primary Economic Growth Towns and large employment sites in Leixlip and Maynooth. Economic development within the LAP area will focus on the potential of the town centre and the town’s significant heritage and tourism offer.

The Celbridge ISP Plan 2016-2020 has interpreted this to mean that Celbridge is a “Primary Economic Growth Town” but there is no strong statement to this effect anywhere else.

The LAP needs to clarify that Celbridge is on a par with the towns that it supports for fear that endeavours to establish employment generating activities in Celbridge will be thwarted by the fact that we “just” play a supporting role in the North Kildare Economic Growth Cluster. The LAP would benefit from explaining without being too prescriptive how the following from the CDP (2.11.2 Economic Clusters) will translate in reality when it comes to development of Celbridge,



Leixlip and Maynooth – i.e. what forms of employment would be considered most appropriate in Celbridge versus the other towns.

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.

If the clarification is that Celbridge is not on a par in consideration as an employment centre and that the support to be given by Celbridge to the North Kildare Economic Growth Cluster will primarily be as a place of residence for workers then, on the basis of Celbridge's larger population, the addition of objectives for the following in this Local Area Plan are essential:

- prioritisation for spending on social infrastructure based on population
- initiatives to work with the NTA on establishing a high quality transport network to link Celbridge directly with Leixlip in particular

Tourism and heritage are the only strengths identified for economic development here whereas the CDP (2.12 Sectoral Strengths) suggested that Celbridge would also have a role in supporting the knowledge based economy focusing on manufacturing/office based industry and logistics

Maynooth and Leixlip - based on the presence of NUI Maynooth, Intel and Hewlett Packard, should brand itself as the knowledge valley, a centre of excellence in the knowledge based economy. The key focus is directed to hi tech/bio tech sectors, research and development, ICT and manufacturing.

Celbridge and Kilcock are designated as supporting centres to Maynooth and Leixlip and will support the knowledge based economy focusing on manufacturing/office based industry, logistics, tourism and natural and built heritage.

4.4 Infrastructure

Parts of Celbridge have suffered from low water pressure and water outages since last summer to the extent that it affects operation of household appliances. While we are aware that work is ongoing, water pressure and supply issues have recurred many times in Celbridge over the last few years. The network is operating close to capacity and any anomalies can overload it. Additionally, sewage connectivity in North Kildare is hindering development of new housing projects⁵. In light of these concerns, we suggest the addition of text in blue to the objective relating to water and wastewater:

The capacity of the water supply and wastewater network will be a critical determinant for significant new development in Celbridge so remedial works to resolve issues relating to capacity, low water pressure and sewerage spills will be prioritised before any additional developments are permitted to increase demands on the network.

In light of the following:

- the term "major traffic generating development proposals" not being specific as to what is meant by "major"
- the 2015 Celbridge Crossing Feasibility Report conclusion "that an additional river crossing is required to be operational in Celbridge in the near future (2019)"
- the noticeable increase in traffic congestion in post-recession Celbridge
- Traffic impact assessments now being known as Traffic and Transport Assessments

we suggest wording changes as follows

The absence of vehicular and pedestrian and cycle crossings of the River Liffey; and of a western link to the north of Celbridge are also serious constraints to future development. All town centre or residential major traffic generating development proposals on the scale of the Key Development Areas (KDAs) identified in this

⁵ Ref. 11th January 2017 meeting of Maynooth Municipal District



LAP will require a Traffic and Transport ~~Impact~~ Assessment to assess the capacity of the transport network to support the development. While the Council will seek to ~~maximise the capacity of~~ ease congestion within the existing network in the short term through ~~active traffic management[???], a new vehicular bridge crossing crossings and a western link will be required to accommodate growth in the longer~~ ~~is~~ required to support the existing population in the near future as advised by the Celbridge River Crossing Feasibility Report (2015), and a ring-road is required as a prerequisite to growth and to decrease traffic levels within residential areas.

The LAP would benefit from clarification as to what is meant by “active traffic management” in an urban setting as many such measures relate to management of traffic on multi-lane motorways. If implementation of active traffic management results in the collation of a bank of traffic movement data captured over a period of time then it will be a very positive step. Reliance on Traffic and Transport Assessment commissioned by property developers with a clear agenda may not give Celbridge the improvements it desperately needs. Data collated on the back of active traffic management measures may be more informative and credible for getting a holistic view of the traffic challenges faced by Celbridge.

The traffic survey performed for Celbridge River Crossing Feasibility Report 2015 is already outdated given the economic recovery over the past 2.5 years and its accuracy is undermined by the fact that it was performed in September when more children walk or cycle to school. The granularity of reporting (in 1 hour blocks) was a bit crude when every 10 to 15 minutes brings very different traffic patterns on the back of school drop-off traffic movements. Treating 07:45-09:15 as peak hour (and a half!) and breaking figures down into 10-15 minute blocks would better highlight where the biggest problems occur so they can be redressed.

4.5 Environment and Heritage Protection

Celbridge Community Council has been unable to correlate the following to specific objectives in the LAP but strongly supports any objectives that open up the River Liffey for enjoyment by the population:

...the LAP has objectives relating to securing strategic open space and green infrastructure, particularly improving accessibility to the River Liffey.

4.6 Future Development Priorities

Celbridge Community Council is well aware that flooding has been a significant problem in the Celbridge-Hazelhatch region and that 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. At the same time, against a backdrop of significant population growth, the fact that Hazelhatch train station is so drastically underutilised reinforces that development near Hazelhatch needs to be prioritised.

The dependency on South Dublin County Council is unfortunate as forcing the people of Celbridge to wait on another County Council to play it's part in the master plan for its side of the county boundary while our town undergoes further imbalanced residential development to the north of the Liffey is at the very least grossly unfair on our commuting population. Celbridge is a commuting town, and there is nothing in the LAP which indicates that it will be otherwise. We are on the doorstep of a largely untapped high quality public transport corridor but commuters already struggle to access it so the quantum of new residential development that should be concentrated close to it should be high thus ensuring that residents can walk or cycle to the station avoiding traffic gridlock at peak rush hour.

Celbridge Community Council hopes that this area will be the key area for development during the lifetime of the next LAP (2023-2029) so encourages Kildare County Council to engage with all relevant stakeholders to ensure that a flood risk management strategy is expedited and that the required master plan be prepared in conjunction with South Dublin County Council.



Celbridge Community Council suggests the addition of the text in blue to the following:

It is envisaged that the potential of lands in the vicinity of Hazelhatch / Celbridge rail station will be explored during the life of this LAP but that no development will commence until solutions for flooding in the area are identified.

Policy CS1 - Core Strategy (p. 14)

In line with concerns previously expressed relating to existing deficits in physical and social infrastructure, Celbridge Community Council feels that provision of infrastructure needs to be a prerequisite for new residential development. We are proposing the removal of the limitation to KDAs on the basis that other developments not currently envisaged as KDAs may need to be covered by this objective.

CSO1.2: To support phasing of new residential development ~~in Key Development Areas (KDAs) in tandem~~ only after the delivery of supporting physical and social infrastructure.

In light of the fact that Celbridge has by far the largest population of all towns that have been designated as “Moderate Sustainable Growth Town” in the Greater Dublin Area, Celbridge Community Council suggests the addition of the text in blue to the following objective

CSO1.3: To support economic and social development that is consistent with the role of Celbridge as a Moderate Sustainable Growth Town and appropriate for the scale of the town.

In light of misalignment between the strategic objectives listed in section 3.2 and the list of objectives in the Core Strategy, suggest the addition of the following new objectives to reinforce the strategic objectives:

CSO1.6: To enhance the physical and social infrastructure in Celbridge addressing deficits identified in the ISP Celbridge Plan 2016-2020 (Section 11 - Infrastructure and Transport) to enhance quality of life for existing and future populations.

CSO1.7: To protect and enhance built and natural heritage as the defining character of the town and a pillar for sustainable growth, by promoting the enhancement, management and understanding of these assets.

5. Urban Centres & Retailing

Celbridge Community Council concurs that Celbridge Town Centre is in need of renewal to enhance its quality, ambience and vitality. However, it begs the question with so many empty retail units along the main street, would the vision be achieved without the proposed town centre extension KDAs.

Celbridge Community Council does acknowledge the positive benefit that the proposed pedestrian river crossing would have on the basis that such permeability will open up accessibility to the town centre for residents living to the south east of town and open up accessibility to St. Wolstan’s Shopping Centre for residents living close to the town centre. The proximity of St. Wolstan’s Shopping Centre to the town centre (within 500m as the crow flies) is such that it may be encompassed as an extension of the town centre in its own right if permeability is so enhanced. The availability of very accessible parking at St. Wolstan’s Shopping Centre combined with this proposed permeability enhancement may just give shoppers a positive enough experience to encourage critical mass to the shops on the main street.

If the land in the KDAs is appropriately used, the concept of town centre extensions may be a positive thing but it is not obvious that there is a clear understanding of the reasons why the town centre lacks vitality to reassure that the town centre extensions will actually redress the issues.

What can be predicted with certainty is that the addition of a new vehicular river crossing (upstream of the current bridge) would divert unnecessary traffic away from the town centre. With traffic so diverted, a concerted focus on the renewal of the existing town centre with exploration of using infill sites and the backlands to the north of the River Liffey might then produce the regeneration needed.



5.1 Town Centre (pp. 15)

On the basis that the following does not convey the full story, Celbridge Community Council suggests the addition of the text in blue to the following:

*In recent years new retail developments on the periphery of the town centre, on the Maynooth Road (Tesco, Lidl and Aldi) and Dublin Road (Supervalu) **coupled with increased traffic congestion in the town centre** have altered the dynamic of the town centre and drawn activity away from the main street.*

In light of the realities of the town centre (traffic congestion and notable lack of vibrancy), suggest rewording the following:

*This LAP seeks to support the primacy of the town centre as the focus for retail and commercial activity and community life and to attract activity back to the Main Street. In order to ~~reinforce~~ **establish** the town centre as a viable and vibrant centre, a mix of retail and commercial, civic, social and cultural uses, in addition to residential development will be encouraged.*

Policy TC1 - Town Centre (p. 16)

In acknowledgement that the town centre currently lacks vibrancy and in order to emphasise a cultural / heritage ambience to the town centre, Celbridge Community Council suggests the following rewording

~~*TCO1.2: To protect the quality, ambience, vibrancy and vitality of Celbridge Town Centre by promoting an appropriate mix of day and night time uses.*~~

TCO1.2: To create vibrancy and vitality in Celbridge Town Centre whilst protecting the quality, heritage and ambience by promoting an appropriate mix of uses.

5.2 Town Centre Expansion (p. 16)

Again, on the basis that the following does not convey the full story, Celbridge Community Council suggests the addition of the text in blue to the following:

*New retail development to serve the growing population has occurred on the periphery of the town along the Maynooth Road and Dublin Road. This **along with traffic bottlenecks** has drawn activity away from the town centre. Town centre extension, on opportunity sites at the edge of the town centre presents an opportunity to strengthen the town centre and to provide for the retailing and service needs of the town's growing population.*

5.3 Retailing (p.18)

Given how an under-provision or ill-siting of parking would compromise the economic growth of the town centre, including our ability to expand tourism, all considerations of proposals for developing retail in the town centre need to consider parking & accessibility for traffic. Suggest adding a new bullet point to the list beginning with "When considering proposals for retail development, the Council will: "

- *Require adequate parking provisions be made and connectivity be improved in the town centre to handle the additional traffic that will be attracted by new retail facilities*

Policy R1 - Retailing (p. 19)

While we appreciate the ambition not to unnecessarily draw shoppers from outside Celbridge into our town for shopping, planning decisions for retail offerings should be made on the basis of the needs of our community and size of population rather than on the basis of protection of other retail locations from our sustainable retail growth. It is equally important that residents of Celbridge not be driven to higher order retail centres for goods and services that might reasonably be expected to be available in a town of our size with targets of sustainability. Just because a higher order retail centre does not have a particular type of retail offering for which there is demand, this is not a good reason for refusing a prospective retailer permission. Just because Maynooth and/or Liffey Valley do not currently have such an offering does not make it inappropriate for Celbridge. Other retail centres can autonomously enhance their own retail offerings to provide similar for their catchment areas.



Celbridge Community Council



On the basis that the start of the following objective is adequate to cover the policy of any retail offerings being appropriate for Celbridge, Celbridge Community Council suggests the removal of the last clause from this objective:
RO1.3: To ensure that the scale and type of retail offer is appropriate to the Tier 1, Level 3 status of Celbridge and is sufficient to serve the local catchment ~~without adversely impacting upon higher order retail centres.~~

While parking is separately addressed in the chapter on Movement & Transport, given its intertwining with consumers' retail experience, Celbridge Community Council suggests the addition of a new objective as follows:

- *RO1.7: To support optimisation of existing parking facilities and the provision of strategically sited additional parking to support new retail developments and tourism activities.*

5.4 Town Centre Public Realm (pp. 19-20)

Policy PR1 - Public Realm

Rather than addressing these items as non-committal actions, Celbridge Community Council suggests the addition of the following additional objectives:

- *PRO1.2: To enforce that all signage on display in Celbridge is authorised.*
- *PRO1.3: To develop a public realm enhancement plan for Celbridge.*



6. Housing & Community

See Appendix A – Opportunities for Enhancement of Content Accuracy for some suggestions relating to content in this chapter.

6.2 Housing Stock

Policy RD1 - Residential Development: Capacity and Delivery (p.25)

In recognition that the housing demand in Celbridge is not organic and again to drive home the importance of infrastructural provision, Celbridge Community Council suggests the following text changes:

It is a policy of the Council to ensure that sufficient zoned land continues to be available at appropriate locations in Celbridge to satisfy the housing needs of the town ~~and~~ as a part of the growing metropolitan area, that each household has access to good quality housing that is appropriate to its circumstance and that the necessary infrastructure is in place.

In the interests of avoiding a scattergun approach whereby multiple KDAs have commenced but none of them has supporting infrastructure or facilities in place, Celbridge Community Council proposes changes to the following objective:

RDO1.1: To promote and facilitate the phased development of ~~identified~~ Key Development Areas that are either identified by the LAP already or that may be identified during the lifetime of this LAP in accordance with the guidance set out in Chapter 12 ensuring that enough critical mass is built in each Key Development Area to support completion of physical and social infrastructure, open space and recreational facilities to a very high standard before focus diverts to another Key Development Area.

In the interests of safeguarding new residents from being left without social infrastructure for lengthy periods of time, Celbridge Community Council suggests rephrasing the following objective

RDO1.2: To secure the provision of social infrastructure and community and recreational facilities ~~in-tandem with~~ as a prerequisite for any future residential development, in accordance with the implementation strategy described in Chapter 13.

Since it should be inconceivable that we would have even a minority of developments that are completely car dependent, Celbridge Community Council suggests rewording the following to include all new housing and to stipulate distance parameters:

RDO1.4: To focus ~~the majority of all~~ new housing in Celbridge within walking or cycling distance of a school cluster, ~~the town centre or~~ transport routes and either the town centre or a neighbourhood centre. Distances to be enforced are as follows:

- a. no property in a new development should be further than a 10 minute walk (800m) from a bus stop*
- b. densities of 35 units per hectare or higher will only be permitted in sections of the development that are within a 5 minute walk (400m) from a bus stop*
- c. properties should either be within 800m walking distance of the town centre or within 400m walking distance from a neighbourhood centre*



6.2.2 Residential Density, Mix and Design (pp. 25-26)

Celbridge Community Council welcomes the housing allocation for Celbridge being at an average density of approximately 30 units per hectare as it is in line with the established character of housing in Celbridge (as 3-4 bedroom family homes). This density seems appropriate for the 4 purely-residential KDAs given how they will not be positioned adjacent to high capacity public transport facilities or particularly close to the town centre however, in all 4 cases, reference is made to the fact that higher density might be achievable where the quality of design and layout is particularly high. What this means is that the densities within the following ranges might be achieved:

- **KDA 3 Ballyoulster:** 30-35 units per hectare
- **KDA 4 Oldtown:** 30-40 units per hectare
- **KDA 5 Crodaun:** 25-30 units per hectare
- **KDA 6 Simmonstown:** 30-35 units per hectare

In relation to

...It is anticipated that an appropriate mix of house types and densities will emerge based on the locational characteristics of each site. Given the strategic location of Celbridge within commuting distance of Dublin and other employment centres in the region, it is anticipated that there will continue to be a strong demand for family housing. The need for smaller housing units and apartments should be considered within each of the Key Development Areas to contribute to the achievement of an appropriate housing mix and to address an emerging demand for smaller units.

Celbridge Community Council feels that

- It is not clear what "locational characteristics" come into play to support higher density on the KDA 4 Oldtown site (up to 40 units per hectare) especially given how badly served that area is in terms of public transport. KDA 5 Crodaun which is on the existing 67 Dublin Bus route has the lowest proposed density of all KDAs (from 25 units per hectare) thus further confusing this!
- The "emerging demand for smaller units" referred to above needs to be explained
 - is this a generalisation based on the trend towards smaller households (smaller families & increasing number of retirees) or
 - is it actually based on knowledge of the housing market in Celbridge? It should be noted that Celbridge has a very low percentage of retirees relative to other parts of the county and it also has a significantly higher percentage of 3-8 person dwellings.
 - Is it based on insights into the types of dwellings sought by applicants for social and affordable housing?

Urban Design Guidelines in the Draft CDP do state that apartments will not normally be permitted in Greenfield Edge Development locations and some CSO 2011 figures are quoted in the Draft LAP to give a breakdown of dwelling types (92% houses, 7% apartments)⁶ and household sizes (40% of dwellings were 1-2 person households and 60% of dwellings were 3-8 person households)⁷. There does not appear to be anything else specific in the LAP with clear applicability to the idiosyncrasies of Celbridge.

Celbridge Community Council feels that the Local Area Plan would benefit from more explicit guidelines regarding what Kildare County Council considers to be an appropriate housing mix for Celbridge. Interpretation of how the following objectives from the Draft County Development Plan 2017-2023 might be mapped applied to Celbridge would be useful in the LAP:

Housing Strategy section (4.1.2)

HSO 8: To ensure that appropriate mix of housing types and sizes are provided in each residential development.

Mix of Dwelling Types 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.

⁶ Section 6.2

⁷ Household Size Celbridge and Kildare chart (Figure 6.2)



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The LAP should draw attention to the **Housing Strategy 2017-2023** contained in Appendix I of the County Development Plan as this highlights the number of applicants for social housing in the county as being 6,869 (possibly over 7,000 now). This number represents over 20% of the housing target for the county. It is clear from the poverty profile of Co. Kildare that the numbers on social and affordable housing lists for Celbridge are disproportionately higher than in many other parts of the county.

Given the gap between the Part V Planning and Development Act 2000 requirement for 10% social housing and the fact that the list of applicants for social housing exceeds 20% of the dwelling unit targets, adequate progress on addressing the crisis is unlikely to be made without a clearer policy. If higher percentages than 10% are to be achieved but it is left entirely to the initiative of the property developers, there is a risk that there will be higher concentrations of social housing in some KDAs than others and that housing provision will get nowhere near the levels needed.

While the onus is placed on the property developer to make an argument for the housing mix they are proposing in their Housing Mix Statements, the LAP can still provide clearer parameters for developers in the interests of future development being plan-led rather than developer-led.

The specifics of the "emerging demand for smaller units" need to be understood as this would have an impact on the rate of childcare places considered appropriate.

Celbridge Community Council proposes the addition of a table in section 6.2.2 of the LAP which provides guidance on dwelling sizes (1, 2, 3, 4, 5+ bedrooms) that are deemed appropriate and an indicative percentage of each dwelling size which should be made available for social and affordable housing to cater for the housing list backlogs.

Celbridge Community Council proposes the following text changes which will reference the new table (numbering to be finalised)

RDO2.2: To ensure that ~~a good~~ the mix of housing types and sizes ~~is~~ provided in each Key Development Area ~~to~~ meets the future needs of the population of Celbridge in accordance with the guidelines outlined in table 6.x.

Given the sensitive nature of the proposed KDA 1 and KDA 2 developments, Celbridge Community Council proposes that specific conditions (such as the use of camouflage architecture in KDA 2) be insisted upon in Chapter 12 and that this be referred to in the following objective along with the new table which provides guidance on housing mix

*RDO2.3: To require the submission of a **Design Statement** (CDP Section 17.3 refers) and **Housing Mix Statement** (CDP Section 17.4.3 refers) with applications for residential development in accordance with the provisions of the County Development Plan.*

to

RDO2.3: To require the submission of a Design Statement (CDP Section 17.3 refers) that addresses the design concept outlined in Section 12.2 and Housing Mix Statement (CDP Section 17.4.3 refers) that meets housing mix goals outlined in Table 6.x with applications for residential development in accordance with the provisions of the County Development Plan.



6.3 Community Facilities

Celbridge Community Council proposes text changes as follows to give a more accurate portrayal of the extent of community facilities

Celbridge has a ~~wide-variety~~ range of community-driven facilities, ~~services~~ and active community groups ~~spread throughout the town~~ that provide an important support network to the residential population. Existing community facilities in Celbridge are identified in Table ~~6-4~~6.2.

Figure 6.4 “Community Facility Distribution” and Table 6.2 “Community Facilities in Celbridge” contain many inaccuracies. See Appendix A – Opportunities for Enhancement of Content Accuracy for suggestions relating to redressing the inaccuracies.

Celbridge Community Council feels that a lack of important community facilities, amenities & infrastructure is a cause for concern and reduces the quality of life experienced across the entire community. Therefore we suggest the addition of a new objective as follows:

To investigate suitable sites for the provision of a Fire/Ambulance Station, a Swimming Pool, a Theatre/Cinema, a Skate Park, and sites that would be suitable for community facilities and amenities.

6.3.2 Early Childcare and Education

The accuracy of the numbers quoted in the following should be verified

There is a variety of private childcare facilities including full day care facilities and sessional services (e.g. pre-school, crèche, Montessori and after school facilities) with 13 no. private sessional services in operation with an additional 7 no. full day care services.

see Table 6.2 in “Appendix A – Opportunities for Enhancement of Content Accuracy” for clarification.

Regarding the following:

"Any childcare facilities which may be required over the plan period should be based on the capacity of existing facilities and/or the needs arising as a result of new development within the LAP area. It is considered that a rate of 20 childcare spaces per 150 dwellings (0.13 childcare spaces per dwelling) represents an adequate level of provision in conjunction with new housing development. "

Based on concerns that the rate of 20 childcare spaces per 150 dwellings is at odds with the 20 childcare spaces per 75 dwellings recommended by the **Childcare Facilities Guidelines for Planning Authorities 2001** (especially in light of the Government’s recent policy of increasing access to childcare), Celbridge Community Council did some local research which confirmed that the proposed rate of 20 childcare spaces per 150 dwellings accurately reflects the current reality in Celbridge.

The latest Early Years Sector Profile⁸ that was published in November 2016 highlights a notable increase in the percentage of toddlers availing of childcare facilities and this was backed up by local childcare providers who explained they are seeing increased demand due to parents returning to paid employment on the back of the economic recovery. Not many childcare providers have spaces for babies as in general it doesn’t pay them to do so – one crèche with 2 baby rooms informed us that they could fill 5 baby rooms if they had them given how high the demand is. With local childcare providers seeing very high demand for baby, toddler and after-school places and a number of parents taking their children to childcare providers outside of Celbridge due to no suitable places being available in the locality, Celbridge Community Council would like to see recognition of this in the text of the Local Area Plan that refers to the rate of childcare provision expected of developers.

⁸ <https://www.pobal.ie/Publications/Documents/Latest%20Early%20Years%20Sector%20Profile%20Published.pdf>



Celbridge Community Council suggests rewording of the rate of childcare as follows:

It is considered that a rate of 20 childcare spaces per 150 dwellings (0.13 childcare spaces per dwelling) represents an adequate level of provision in conjunction with new housing development at this time but regular analysis of demand for childcare spaces in Celbridge will inform the appropriate rate.

Policy COM1 - Education, Childcare and Health Facilities (p. 29)

Celbridge Community Council suggests rewording of the rate of childcare as follows:

COMO1.2 To require the provision of a minimum of 0.13 childcare spaces per dwelling on a pro-rata basis in the Key Development Areas, in accordance with the phasing requirements set out in Chapter 13. This rate of provision will be revised where high demand for childcare spaces prevails.

Policy COM2 Community & Recreational Facilities (p.30)

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 greater commitment to support the Celbridge ISP in delivering this objective.

Additionally, reference might be made to the County Kildare Play & Recreation Policy which is currently being devised and how it might be used to guide delivery of recreational facilities whether it's a skate park, outdoor exercise equipment or other form of recreational facilities.

In recognition of the current deficits in provision of community facilities, Celbridge Community Council suggests the following changes to objectives:

COMO2.2: To ensure that adequate and safe amenity and recreational open spaces are available for all groups of the population at a convenient walking distance from their homes and places of work. Convenient walking distances are 5 minutes (400m) wherever possible but never any more than 10 minutes (800m).

6.5 Celbridge Integrated Services Programme (p.30)

Celbridge Community Council welcomes the commitment to the ISP goals but suggests the addition of text in blue to the following

While many elements of the ISP will be implemented through complementary initiatives and programmes, it is important that the LAP recognises the ISP goals. In particular, the LAP will support tourism and heritage development and the delivery of facilities for children and young people, and a service for older people which the ISP has identified as being undersupplied in Celbridge. The LAP will also support other initiatives as identified by the ISP, and commit to post-ISP support and operational presence.

and the removal of "where appropriate" from the following

COMO3.1: To promote and facilitate, ~~where appropriate,~~ the realisation of the goals and objectives of the Celbridge Integrated Services Programme.



7. Economic Development

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

Celbridge's location within the North Kildare Economic Growth Cluster appears to have been interpreted by the Celbridge ISP Plan 2016-2020 to mean that Celbridge is a Primary Economic Growth Town.

Celbridge Community Council recommends that the Local Area Plan is more explicit here to ensure that Celbridge is on a par with the towns that it supports in consideration as an employment centre. The vision for economic development might be rephrased along the following lines:

To promote and support economic development for Celbridge that is ~~consistent with the role of Celbridge as a Moderate Sustainable Growth Town. The town's location~~ appropriate for towns located in the North Kildare Economic Growth Cluster and to leverage its heritage and tourism assets as a driver for economic activity ~~are identified as key economic strengths.~~

7.4 Tourism (p. 34)

Celbridge Community Council does not believe that the proposed KDA 2 at Donaghcumper is in line with the aspiration expressed by the following:

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 develop Celbridge as a heritage destination.

Policy ED2 - Tourism

In view of the following

1. 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
2. Kildare County Development Plan's objective "To support the expansion and development of tourism in Kildare, investigating the feasibility of key opportunities such as those centred on the racing industry, retail, golf and eco-tourism to include: Arthur's Way, ..., the Grand Canal Greenway and other opportunities." (EO 37)
3. the fact that a very short stretch of this proposed Grand Canal Greenway is in County Kildare

Celbridge Community Council proposes that the Grand Canal Greenway be mentioned in the following objective as, despite being outside the boundary of the LAP, if developed as an amenity it has the potential to attract visitors to Celbridge and to encourage cycling as a mode of transport for commuters:

EDO2.3: *"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 and the Grand Canal Greenway, subject to relevant environmental assessments."*

Celbridge Community Council proposes an additional objective in this section as follows:

EDO2.11: *To support attracting those visiting Castletown House into the town centre through provision of sensitively positioned parking on the Celbridge side of Castletown House.*

To ensure that the New Pedestrian / Cycling objective marked on the Transport and Movement Map through the Strategic Open Space in the grounds of Celbridge Abbey has an objective backing it up, Celbridge Community Council proposes an additional objective in this section as follows:

EDO2.12: *To support access to trails within the grounds of Celbridge Abbey including passage over the Rock Bridge to cross the River Liffey.*



The EDO2.12 label should be added to the Transport and Movement Map to correlate the text of the LAP with the map.

7.5 Derelict Sites and Vacant Sites

Celbridge Community Council proposes the insertion of a new objective along the following lines (obviously finding a more politically correct way to convey application of “the full rigours of the law”!):

Kildare County Council will compile a list of derelict sites and vacant sites in Celbridge by the end of 2017 and apply the full rigours of the law thereafter

8. Movement & Transport

8.1 Walking and Cycling

On general principles, Celbridge Community Council favours permeability for pedestrians and cyclists where people within acceptable walking and cycling distances of public transport, schools, sports grounds, neighbourhood centres, shops etc. can access facilities and services without having to rely on cars. Celbridge has an acute traffic problem in the mornings at school drop off times which is exacerbated by school children having to take circuitous routes from their homes to schools.

We do however understand concerns of residents in relation to antisocial behaviour and object to solutions that open up narrow alleyways, routes that are not overlooked and/or are badly lit. Any permeability changes for existing residential areas need to be well planned and happen in consultation with the local residents associations. Antisocial behaviour needs to be tackled from the ground up and while this is not directly in the remit of a LAP, commitment to provision of facilities such as play parks (especially for teens), swimming pool and other sports facilities, cinema etc. would play a significant role in diverting the energies of teens from “hanging out” looking for something to do to filling their time with constructive activities.

Policy MT1 – Pedestrian and Cycle Movement (p.37)

Celbridge Community Council proposes the changes in blue below to provide explicit mention of routes from the Cycle Network Plan that are currently badly served – facilitation of these routes would have benefits for some or all of school children, commuters and tourists.

MTO1.2: *To facilitate and encourage cycling as a more convenient and safe method of transport through the development of new or improved cycle facilities in Celbridge with a particular focus on the routes identified in the National Transport Authority (NTA) Greater Dublin Area Cycle Network Plan to link population, commercial, community facilities, schools and transport nodes. Any new development to facilitate routes identified in the Greater Dublin Area Cycle Network Plan shall be subject to the mitigation detailed in the environmental assessments for that plan. Particular focus should be given to the following*

- a. *to support Waterways Ireland and South Dublin County Council in completion of the Grand Canal Greenway*
- b. *to develop a dedicated cycle lane along the Clane Road with the path diverting into the grounds of Celbridge Abbey as provision for pedestrians and cyclists becomes more difficult with the narrowing of the road.*
- c. *to develop a dedicated cycle lane along Church Road*
- d. *to develop a dedicated cycle land along Willowbrook Road*
- e. *to develop greenways within Castletown Demesne*



On the face of it, the permeability enhancements proposed by MTO1.7 appear well thought out and would have a positive effect on reducing traffic volume and the length of time needed for school children and other pedestrians to reach their destinations. However, these could only be rolled out in a manner that addresses concerns of residents about antisocial behaviour.

MTO1.7e (Ballymakealy Grove to North Kildare Educate Together National School) would presumably consist of a pedestrian gate that is opened by the school for a short time in the mornings and afternoons to facilitate children arriving at and departing. The number of children attending this school is due to grow by another 170-180 over the next 6 years so this would be a valuable permeability enhancement.

Objectives need to be added to the LAP for the construction of paths for pedestrians and cyclists to reinforce the routes marked on the transport and movement map (8.1) in the Draft LAP.

8.2 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 and ISP Celbridge Plan 2016-2020) suggesting an inadequate public transport offering for the town. The development of Celbridge and Leixlip is inter-linked 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 and beyond, yet they have no public transport options available to them.

Policy MT2 – Public Transport

MTO2.1 is a very positive objective in terms of interlinking services and maximising efficiency of existing services as is MTO2.6 which promotes alternative routes to Hazelhatch Train Station.

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.

and our understanding of desirable routes for people, Celbridge Community Council feels that support for additional Public Transport along the following lines is needed:

- local bus routes within the North Kildare metropolitan area including a route that connects Louisa Bridge and Hazelhatch train stations via Celbridge (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)
- orbital bus routes between North Kildare and key destinations in West Dublin



While Celbridge Community Council is broadly supportive of the following objective

MTO2.6: To promote alternate routes of the bus service to Hazelhatch Train Station so that it serves Main Street, Shackleton Road and Clane Road.

This will not resolve all the “difficulty getting to the train station” reasons why Hazelhatch train station is underutilised by commuters from Celbridge, for example:

- the existing feeder bus service between Celbridge and Hazelhatch does not serve all trains (none served off-peak and only some peak trains are served)
- members of the public are ill-informed of the feeder bus’s stops and timetable.
- traffic to the station from north of the Liffey (the feeder bus included) crosses over the bridge. Delays are unpredictable thus the risk of missing a train is high

In addition to the proposal to serve additional areas by a bus to Hazelhatch, simple changes like adding bus stops with timetable information and increasing service on the existing route would be beneficial. Pending resolution of the traffic issues caused by delays at the bridge, consideration might be given to serving the Ardclough Road with a feeder bus and opening up the Rock Bridge in the grounds of Celbridge Abbey to allow pedestrian access to the Ardclough Road from estates on the Clane Road

MTO2.4 refers to management of development particularly in lands south of the town centre. This is logical considering Hazelhatch Train Station needs to be better utilised.

8.3 Roads and Street Network

Traffic problems caused by the existing 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 LAP and beyond would further exacerbate the existing traffic problems, particularly those caused by the bridge.

Celbridge Community Council notes that the County Development Plan 2017-2023 lists both a new bridge crossing and an upgrade of the existing bridge as “Priority Road and Bridge Projects”. 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. This would ensure the already over congested bridge would not be further inundated with commuter traffic. 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 concludes that an additional river crossing is required to be operational in Celbridge in the near future (2019). However it is a serious concern for the town that the Draft LAP sees this as a longer term measure. To complete in the near future, work would need to be underway already. 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.

In addition to our support for another vehicular bridge crossing upstream of the existing bridge, Celbridge Community Council feels that the provision of a ring-road is also a crucial pre-requisite for any significant housing growth. This ring-road should be located on the town boundary running from the roundabout at Crodaun to the north all the way around to the Lucan Road avoiding existing residential development like Hazelhatch Park.



Policy MT3 - Transportation

On the basis that the strategic road objectives have an importance that reaches beyond access for the Key Development Areas, Celbridge Community Council suggests the following change:

*MTO3.3: To secure the provision of the strategic road objectives identified on Map 8.1, which **provides will divert traffic away from the most congested junctions and provide** access to new communities and Key Development Areas within the town.*

While new bus services need to be developed in consultation with other parties, from a planning point of view provision can be made for ensuring that roads can accommodate these routes in the future. On this basis, Celbridge Community Council suggests changes as follows:

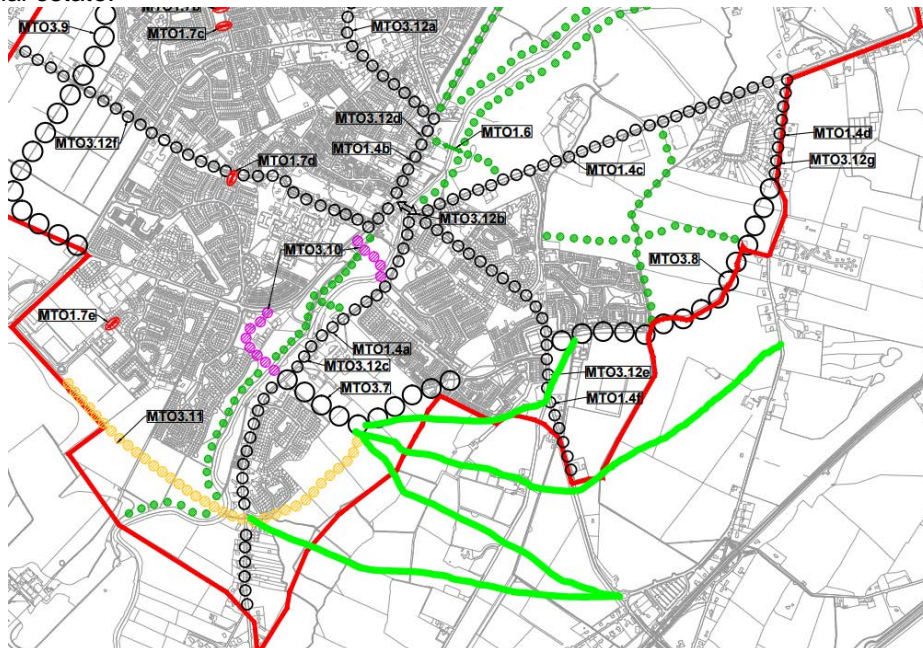
*MTO3.8: To facilitate the construction of a road from Primrose Hill to Loughlinstown Road **with adequate provisioning for its use as a bus route** in tandem with the development of KDA 3 and in the interim to protect this route from development.*

*MTO3.9: To facilitate the construction of a Western Link road from Maynooth Road to the Oldtown Road **with adequate provisioning for its use as a bus route** in tandem with the development of KDA 4 and associated lands and to protect this route from development in the interim.*

and the addition of a new objective something like the following:

MTO3.17: To ensure that strategic road developments allow sufficient space for bus routes including provision for turning circles and dedicated bus stops which do not cause traffic delay where a bus route might reasonably be expected to run in the future.

On the basis that the MTO3.7 objective to run a road from Hazelhatch Park through to the Newtown Road will result in large volumes of traffic through Hazelhatch Park (an established residential area) once the MTO3.10 vehicular bridge crossing is realised (at either of the 2 proposed locations), Celbridge Community Council proposes that MTO3.7 be changed to propose a southern link road that runs south of Hazelhatch Park – a number of options could be considered depending on plans for development of land towards Hazelhatch but none of these will run traffic through an existing residential estate.





On the basis that the right turn onto Church Road at Scoil na Mainstreach blocks through traffic on the Shackleton Road causing significant delays at school drop-off time in the mornings, Celbridge Community Council proposes that an additional road improvement be listed in

MTO3.12: To carry out the following road improvements (See Map 8.1):

as follows:

h. Improve the junction of Shackleton Road and Oldtown Road / Church Road and provide school drop-off facilities on Shackleton Road for pupils attending Scoil na Mainstreach in a manner that does not obstruct other traffic as part of the development of KDA 4.

On the basis that the road network is already over capacity especially during peak morning and evening rush hour periods, Celbridge Community Council supports the following action:

To maximise the capacity of the local road network and reduce congestion by implementing a range of targeted actions to enhance the accessibility of key destinations in Celbridge (e.g. schools, shops and community facilities) by walking, cycling and public transport use.

In response to the marked increase in traffic congestions as the economy improves and the consequent unreliability of the figures from the 2014 traffic management study, Celbridge Community Council recommends that a further traffic management study to be carried out. Reporting should be based on the duration of rush hour (approx.. 07:45-09:15) on a Tuesday, Wednesday or Thursday morning during winter months.

8.4 Car Parking

While the Draft LAP outlines parking that is available in the town centre, Celbridge Community Council feels it needs to highlight the serious issue whereby lack of parking in the town centre close to the gates of Castletown House means that visits to Castletown House occur without visitors ever setting foot in Celbridge town. A tourism based economy cannot get off the ground much less thrive when visitors approach and leave Castletown House via J6 off the M4.

Policy MT4 – Car Parking

Celbridge Community Council suggests that the aspirations laid out in this section need to be more specific regarding a plan to work with stakeholders regarding a car-park near the junction of Main Street and the Castletown Parklands. This aligns with the Heritage & Tourism strategy which is a key element of this LAP.

In relation to MTO4.1 c.

MTO4.1: In relation to Car Parking it is an objective of the Council:

...

c. To ensure the provision of permanent durable surfaces to all public and private car-parking facilities.

Celbridge Community Council believes that enforcing permanent durable surfaces may not be necessary and that there may be places where car park surfaces like the grass protection mesh at Farmleigh House would be the most appropriate format.





9. Infrastructure

9.1 Water

Areas of Celbridge suffer from low water pressure and experience ongoing issues with regard to sewerage spills. Failure to prioritise remedial works to resolve these issues will lead to exacerbated problems as more housing is built. Additionally the pipework and pumps carrying waste to the Leixlip Water Treatment Plant are at capacity and additional developments are on hold until this issue is addressed.

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 Local Area Plan.

The somewhat detached tone of statements like the following:

Kildare County Council will continue to support Irish Water in identifying the water services that are required to support planned development in Celbridge

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 new developments in Celbridge and must be committed to supporting the successful delivery of water services including remedial works to existing networks.

9.1.2 Wastewater

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 Local Area 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.

The plan calls-out so-called constraints within the local network and they simply must be overcome if this LAP is to be delivered

Policy INF1 – Water Supply & Wastewater

Celbridge Community Council would like to see something stronger than the following action:

The Council will encourage pre-planning application consultation with Irish Water

A specific objective rather than an action would make sense and consultation should be required rather than just encouraged.

9.4 Energy Supply and Communications

Policy INF4 – Energy and Communications

Celbridge Community Council proposes that objective INFO4.2 be updated to insist that all Broadband suppliers undertake a study of what is available, and plan for any deficits. This study should be completed before the end of 2018. This is aligned with the location of Celbridge within both the Dublin Metropolitan Area and the North Kildare Economic Growth Cluster.



Celbridge Community Council proposes that all overhead lines which pass through residential and recreational lands should be undergrounded in the near future, and before the end of 2019. This is aligned with the Chief Executive's report on the pre-draft submissions, and also aligned with the strategy to pursue Heritage & Tourism as economic drivers for Celbridge. This may require some re-wording of objective INFO4.3 to be clear that this applies to all lands within the boundaries of the LAP and not just the town centre.

9.4 Solid Waste

Celbridge Community Council proposes that the following wording be changed to express a time commitment to identification of suitable sites for glass and can recycling.

Recycling facilities for glass and cans are located at Tesco car park, Supervalu and Celbridge GAA Club. ~~Other suitable sites will be identified over time.~~ Kildare County Council will commence a project before the end of 2017 to identify other suitable sites, as current facilities are already working over capacity.

This might be accompanied by an update to objective INFO4.1 to state

*INFO4.1 To adequately maintain recycling facilities and to secure the provision of additional facilities, as required, **during the lifetime of this plan** including in conjunction with new development.*

10. Built and Natural Heritage

10.2.2 Zone of Archaeological Potential

Celbridge Community Council notes the cost implications (in terms of time and money) that the following may have on the proposed KDA 1 (St. Raphael's) and on the more downstream vehicular bridge option.

Developments located within a Zone of Archaeological Potential and/or close to known archaeological monuments or sites, including site works that are extensive in terms of area (ground disturbance of half a hectare or more) or length (1 kilometre or more) and developments that require an Environmental Impact Statement will be required as part of the planning application process, or by condition of planning permission, to carry out archaeological assessment, monitoring, testing or excavation within the area either prior to the planning decision or prior to any development proceeding on site. The Council, as a condition on such developments, may consider the preservation of all or part of the archaeological remains in the area covered by that permission.

though the development of KDA 1 will probably help fund the realisation of the conservation and management plan for St. Mochua's church that is outlined in objective BHO2.5

10.3 Architectural Heritage

Policy BH3 – Architectural Conservation Areas

Celbridge Community Council support the BHO3.1 objective to designate two ACAs in Celbridge, but suggests that Celbridge Abbey and Oakley Park be included within the ACA area as these are historic buildings which contribute strongly to the heritage of the town.



11. Green Infrastructure & Strategic Open Spaces

Policy GI 1 – Green Infrastructure (p.57)

Though not Movement and Transport objectives, might the GIO 1.5 label be applied to the “New Pedestrian / Cycle Objectives” marked on Map 8.1? We made a similar submission relating to the EDO2.12 label being added to the Transport and Movement Map to correlate the text of the LAP with the map.

Celbridge Community Council’s concern is that although “New Pedestrian / Cycle Objectives” are marked on Map 8.1, they are not labelled with objective numbers and without this, they may be deemed not to be objectives at all. There are no maps for sections 7 or 11 of the LAP.

Maybe the Movement and Transport section needs explicit MTO1.x objectives in relation to this network of paths and cycle tracks.

11.3 Open Spaces

The provision of open space is absolutely critical to the well-being and development of all citizens and Celbridge Community Council does not consider that the LAP is strong enough in its desire to deliver this infrastructure. For fear that the open space areas in KDAs will be left fallow, Celbridge Community Council feels that property developers must be compelled to deliver landscaped open space, play areas and parks that are safe, permeable and easily accessible on a pro rata basis with delivery of dwellings in, for example, blocks of 50 dwelling units. Many lessons can be learned from our developer-led history whereby “open space” in some residential areas is relatively inaccessible and it’s unsafe to spend time there.

On the basis that the grounds of Celbridge Abbey used to be open to members of the public and the riverbank therein is to be zoned as strategic open space in this LAP, Celbridge Community Council proposes the addition of the following objective in blue:

OSO1.7: To liaise with St John of Gods to secure access to the existing paths in the grounds of Celbridge Abbey for the public and with other stakeholders to secure access to other grounds bordering on the Liffey.

On the basis that Celbridge is very poorly serviced by play areas, Celbridge Community Council proposes the addition of the following objective in blue:

OSO1.8: To require playgrounds, outdoor fitness equipment and other play spaces and equipment in accordance with the advices of the play & recreation survey performed by Kildare County Council.



12. Urban Design & Key Development Areas

Celbridge Community Council is supportive of zoning and development that would

- open up the banks of the River Liffey for the enjoyment of the general public
- provide entertainment facilities such as a cinema, performing arts centre etc.
- provide sports facilities such as a swimming pool
- provide additional retail outlets on the Main Street
- address the traffic problems that deter shoppers from shopping in the town centre and delay commuters

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

Celbridge Community Council feels that too much development is being proposed for the north-west of town as essential infrastructure like the link road and vehicular bridge are unlikely to be delivered in a timely manner.

12.2 Key Development Areas – Design Concepts

12.2.1 KDA 1 – St. Raphael’s (Oakley Park) Master Plan

On the basis that master plans are non-statutory documents, Celbridge Community Council proposes that the LAP inserts text following

Development in KDA 1 shall be supported by a Masterplan.

which clearly states that a public consultation will be an integral part of the preparation of the master plan.

Due to lack of a design concept, it is difficult to comment further on this development at this time.

12.2.3 KDA 2 – Donaghcumper

Celbridge Community Council proposes that KDA 2 Donaghcumper Town Extension be removed entirely from the Draft Celbridge LAP 2017-2023 and that all the lands of the demesne, as defined by the boundary wall and the River Liffey, be re-zoned “Open Space & Amenity” for the benefit of the population of Celbridge and the wider community. We propose that the estimated 150 residential units for KDA2 be located close to other areas of new residential zoning that have been identified on Map 13.1 in this plan.

Celbridge Community Council proposes that the river-walk trail on land zoned as “Strategic Open Space” on Map 13.1 in this plan should be preserved from development and made accessible to the community from several points along the river.

12.2.4 KDA 3 – Ballyoulster

Of all the proposed developments, Celbridge Community Council feels that KDA 3 is the one least likely to exacerbate traffic in the town centre provided the schools are available for use from early in the development.



12.2.5 KDA 4 – Oldtown

Based on the size of this proposed development, the fact that it is least well positioned in terms of public transport, the fact that higher densities are expected to be achieved here with “particularly high quality design and layout” than on any of the other KDAs, and the knock-on effects this KDA will have on the rest of the town, Celbridge Community Council proposes that development in KDA 4 be supported by a Masterplan and that public consultation must be an integral part of preparation of the Masterplan. The road linking the Clane Road to the Maynooth Road is an essential component of this proposal and should be provided much earlier than is suggested in the implementation section - it would be beneficial today without a single extra dwelling unit being built and inhabited.

KDA 5 – Crodaun

Since no school is proposed for this location, additional population here will add to the congestion on the Maynooth Road in the mornings and, for this reason, Celbridge Community Council proposes that no more than 200 dwelling units be built before connectivity to the Clane Road has been achieved via the proposed new link road. Celbridge Community Council feels that widening / re-alignment of the Maynooth Road at access points to the estate would be beneficial as a central reservation for traffic turning into the estate could be achieved. Mini-roundabouts might also be beneficial for residents trying to get out of their estate.

KDA 6 – Simmonstown

The road connecting into Hazelhatch Park may prove to be a sticking point here. Consideration might be given to running objective MTO3.7 south of Hazelhatch Park to keep commuter traffic out of residential area.



13. Implementation

13.1 Implementation Strategy

Celbridge Community Council proposes an initiative for a mid-term Status Report in 2020, and also an Evaluation Report at the end of the defined period. This will allow for regular assessment and an easier transition into the following LAP period.

A review in light of the proposed National Planning Framework Ireland 2040 strategy⁹ will be very worthwhile especially if it becomes evident that the new framework is vastly different to the National Spatial Strategy under which our targets were decided.

13.5 Phasing

Given the provision of new & improved infrastructure is fundamental to any development, and also important to the existing community, Celbridge Community Council suggests a rewording of the following point as follows:

“The purpose of the phasing is to ensure that infrastructure, facilities and amenities are provided ~~together with new residential development.~~ before any new residential development, or at a minimum before any new dwelling units can be populated.”

KDA 1 – St Raphael’s Oakley Park Masterplan Area

Depending on the mix of uses proposed for this KDA, completion of the new vehicular bridge crossing may become an important prerequisite.

KDA 2 – Donaghcumper

As we are opposed to the zoning of this area as “Town Centre”, this phasing does not apply.

KDA 3 – Ballyoulster

Given the absence of accessible parklands, playgrounds and play space generally in the areas to the south of the Liffey, open space should be provided sooner than commencement of dwelling units 350+ in this development. Celbridge Community Council proposes that a pro-rata portion of the required infrastructure (including open space facilities) be put in place for every 50 dwellings.

KDA 4 – Oldtown

Given the existing traffic gridlock experienced in Celbridge, Celbridge Community Council proposes that a requirement be imposed that the link road from the Clane Road to the Maynooth Road be completed before commencement of phase 1 (first 450 dwellings). Given the extent of pylons, undergrounding of electric cables should also be an important prerequisite for development at this location.

KDA 5 – Crodaun

Given the significant movement that will be required from this residential development to other areas of town, Celbridge Community Council proposes that a requirement be imposed that no more than 200 dwelling units be built before the link road from the Clane Road to the Maynooth Road is completed.

KDA 6 – Simmonstown

Celbridge Community Council agrees that the vehicular bridge is a prerequisite for development at this location.

⁹ <http://npf.ie/about/>



Celbridge Community Council



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

Yours faithfully,

David Trost

Secretary

Celbridge Community Council



Appendix A – Opportunities for Enhancement of Content Accuracy

This appendix details changes that may enhance the document by providing additional clarification or correcting inaccuracies and typographical errors.

The terms “North Kildare Economic Cluster” and “North Kildare Economic Growth Cluster” are used interchangeably throughout the Draft LAP. Agree on the correct term and update others.

Since the opening of Celbridge Community School under joint ETB / Educate Together patronage, the primary school once known as North Kildare Educate Together (NKETS) has been renamed as North Kildare Educate Together National School (NKETNS). References to the former should be replaced with the latter throughout the document.

1.6 Planning Policy (p. 6)

In the list of policy documents,

- update “Draft Kildare County Development Plan 2017-2023” to the final version which will presumably be finalised before publication of the LAP.
- consider adding 2001 Guidelines for Planning Authorities on Childcare Facilities¹⁰ or more recent guidelines if available
- consider adding 2014 NRA Traffic and Transport Assessment¹¹

2.1 Historical Development (p.7)

Consider using the population value of 20,631 quoted in the Draft Kildare County Development Plan 2017-2023 (Proposed Material Alterations, Table 3.3) or a more specific figure if available before publication of the LAP instead of “approximately 20,000” in the following:

Preliminary results from Census 2016 indicate that the population in 2016 has grown to ~~approximately 20,000~~ 20,631.

6.1 Demographic Profile (p.22)

Consider using the population value of 20,631 quoted in the Draft Kildare County Development Plan 2017-2023 (Proposed Material Alterations, Table 3.3) or a more specific figure if available before publication of the LAP instead of “may now exceed 20,000 persons” in the following:

This suggests that the population of Celbridge may now exceed ~~20,000~~ 20,630 persons.

6.2 Housing Stock (p.24)

Check accuracy of **Figure 6.3 Spatial distribution of housing in Celbridge 1998-2016** and/or the interpretation of it that is taken in the Draft LAP. A legend may be needed to explain the use of the blue, green and turquoise colours. 2 items of confusion that we note

¹⁰ <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload%2C1601%2Cen.pdf>

¹¹ <http://www.nra.ie/tii-library/land-use-planning/Transport-Assessment-GuidelinesMay2014.pdf>

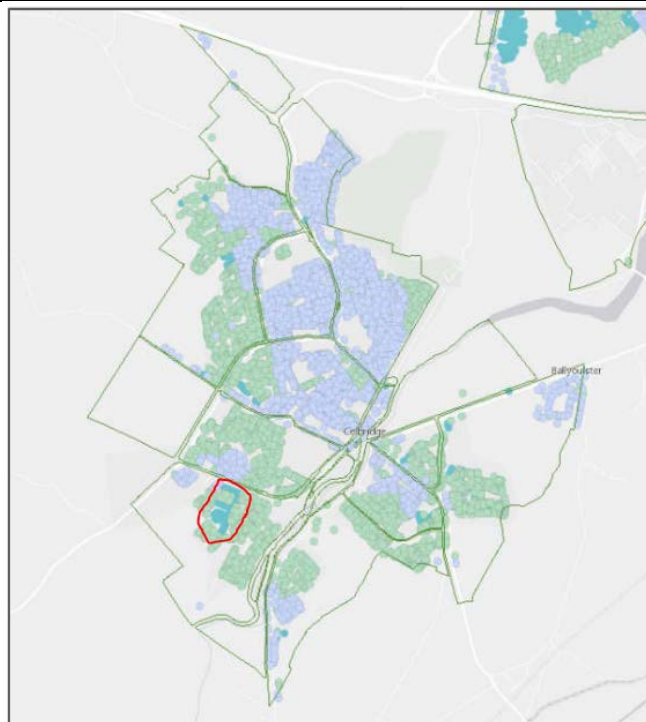


Is the map labelled as 1998 actually a map from pre-1990? It does not show developments such as Abbey Farm (1990), Grattan Court (1994), Celbridge Abbey (1992) and St Raphael's Manor (1994–98) which had already been built.



1998

What is marked in turquoise in the map labelled as 2011? It appears to be around Ballymakeally but that estate was built in 2000.



2011



Figure 6.4 Community Facility Distribution

- This map shows the 3 post-primary schools but only 5 of the primary schools.
 - St. Brigid's is probably obscured by the big block of red in the town centre and
 - both St. Raphael's Special School and Weston Primary Montessori School are missing.
- This map shows 5 locations for Medical centres / surgeries
 - Dr O'Briens' surgery (Larkfield) has relocated to the new Primary Care Centre so the medical surgery on the Maynooth Road closest to the gates of Castletown House should be removed
 - There are 2 separate doctors surgeries close to one another on the Shackleton Road (Oaktree Clinic & Dr Waters) so an additional one should be shown here
- The term "crèche" is generally used to refer to full day childcare facilities but the orange dots on the map confuse crèches with pre-schools etc. Somewhere that minds your children all day to allow you to go to work is very different to somewhere that takes your child for a 3 hour ECCE session.
http://www.tusla.ie/uploads/content/Kildare_November.pdf lists 16 sessional facilities and 5 full daycare crèches but only 13 are marked on the map

Table 6.2 Community Facilities in Celbridge (pp.27-28)

Amendments needed to data in table for accuracy

- The table states that there are 8 primary schools. Either list them all – i.e.
 - NKETNS
 - Aghards
 - Scoil na Mainstreach
 - St. Brigid's
 - St. Patrick's
 - Primrose Hill
 - St. Raphael's Special School
 - Weston Primary Montessori School (renamed from "Glebe Primary Montessori School" Barnhall Rugby Club is outside Celbridge LAP though!)
 - Not sure of status of new Donacomper Primary Montessori School in Primrose Gate (heard it didn't last long?)

Or state that one is a Special School and one a private primary Montessori outside the boundary of the LAP and serving Celbride, Leixlip, Lucan and surrounding areas.
- The table states that there are 13 childcare facilities. The number is incorrect when referenced against http://www.tusla.ie/uploads/content/Kildare_November.pdf. Since this list is a list of early years providers, there are some after-school services that are not listed. Perhaps state the provision of Childcare as
 - 5 Full Day Care (Crèche) – babies, toddlers, pre-schoolers and some afterschool
 - Chatterboxes Creche
 - Cocoon Childcare
 - Giraffe Childcare
 - Kiddies Choice
 - The Purple Penguin
 - 16 Sessional pre-school / Montessori – pre-schoolers and some afterschool
 - Allsorts Playschool
 - Busy Bees
 - Celbridge Montessori School
 - Donaghcumper Primary Montessori School (still open?)
 - Farmlee Childcare
 - Happy Days
 - Jane's Tree Top Montessori
 - Kidzstuff
 - Memory Land Playschool



- Naionra Aoibhneas
- Phil's School Around the Corner Playgroup
- Primrose Montessori Pre-School
- The Children's Circle
- The Kindergarten @ Gymboree
- Tir na nOg
- Vivienne's Playschool
- Healthcare – the 5 medical centres are
 - Centric Health in new Primary Care Centre – Maynooth Rd
 - Oaktree Clinic – Shackleton Rd
 - Dr Waters – Shackleton Rd
 - Walsh's Medical Centre – Main St
 - Cliona Ryan – Primrose Gate
- Garda Station opening hours are incorrect – these should be verified but we believe them to be Monday-Friday (2-6 and 7-9pm), Saturday (2-6pm), Sunday (12 noon to 2pm)
****Note**** Many members call during hours when the station is supposed to be open only to find that there is no one there.
- Sports Facilities
 - Add Celbridge Athletics Club to list
 - Elm Hall Golf Club and MU Barnhall Rugby Club are not located in Celbridge (LAP boundary). Both are “regional” clubs and not just a Celbridge community facility.

6.3.3 Healthcare

Re.

The HSE is in the process of constructing a new primary care facility along Maynooth Road.
and the footnote saying “Due to open in early 2017”, the facility is complete and Centric Health Medical & Dental Practice is already open but HSE are in the process of moving to the new Primary Care Facility. So rephrasing required here to be more current.

6.4 Additional Social Infrastructure (p.29)

Rectify name of company who owns The Mill Community Centre from
Celbridge Community Council Ltd

To

Celbridge Community Centre Ltd

7.2 Economic Profile (p.32)

The following

The census indicates that 12% of the working population were employed in Celbridge, 60% worked outside of Celbridge and 15% worked elsewhere in Kildare.

Would be clearer is phrased as follows:

The census indicates that 12% of the working population were employed in Celbridge, 15% worked elsewhere in County Kildare and 60% worked outside of County Kildare.



8.2 Public Transport

Celbridge Community Council feels that the following description of how “well” the buses serving Celbridge actually link the town to key destinations could be made more accurate by the removal of the suggestion that anywhere other than Dublin and Maynooth are key destinations for residents of Celbridge. Towns like Leixlip, Naas, Blanchardstown and Tallaght would be considered key destinations but they are not served by buses that pass through Celbridge.

Celbridge is served by Dublin Bus and Bus Eireann with connections to [key destinations such as Dublin and other key destinations such as Nowbridge, Edenderry, Clane and Maynooth.](#)

Again, Celbridge Community Council feels that the following description of how “well” the trains serving Hazelhatch station actually link the town to key destinations could be made more accurate by the removal of the suggestion that intercity trains stop in Hazelhatch.

“Hazelhatch Train Station is located in the south of Celbridge and is served by the ~~Portlaoise/Limerick, Kildare/Waterford and Galway services from Dublin~~ [Portlaoise-Dublin Commuter Line](#) which indirectly connects with intercity trains on the [Cork, Limerick, Killarney, Waterford, Galway and Westport lines.](#)”

Celbridge Community Council feels that the description of how the feeder bus from Hazelhatch train station serves the town centre is unclear as to how limited this service is.

Currently a feeder bus runs to and from the town centre of Celbridge to Hazelhatch Train Station to connect with [some of the rail services to & from the Dublin rail services.](#)

8.3 Roads and Street Network

Policy MT3 – Transportation (p.39)

Celbridge Community Council feels that the LAP would benefit from more clarity as to what is envisaged by Intelligent Transport Systems in the following as the term means different things to different people.

MTO3.2: To safeguard the capacity of the road network in Celbridge through the use of Intelligent Transport Systems.

9.4 Energy Supply and Communications & 9.4 Solid Waste

Duplicate section numbers. Change Solid Waste to 9.5.

12.2 Key Development Areas - Design Concepts

12.2.2 number skipped in headings for KDAs (goes from 12.2.1 to 12.2.3)



Appendix B – ISP Celbridge Plan Findings, Goals and Objectives

Area	Research Findings	Goal	Objective
4. Children & Young People	Deficits in social work services targeting vulnerable young people and children including substantial waiting lists, increasing case loads and staff shortages	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.	1. Reduce waiting lists and increase Tusla supports to vulnerable children and young people
	The lack of a developed family, community and voluntary sector to support delivery of supports to families and children services		2. Increase awareness, services and supports to young people and their families affected by drug/alcohol misuse
	Issues with the cost and flexibility of childcare		3. Extend youth provision through the expansion of services and recreation facilities for young people in Celbridge for teenagers to develop.
	Concern regarding alcohol and drug misuse by young people as young as 11 years of age		4. Increase mental health supports and additional services for children and young people.
	Mental health issues and substantial challenges in accessing relevant supports		
	Limited play and recreation areas for children and young people		
	Demand for increased provision of youth services, particularly for older teenagers		
	Many young people from Celbridge identifying with Dublin rather than with Kildare		
	Young people experiencing difficulties managing social media and bullying		
	Lack of engagement by young people not involved in sports, scouts or youth clubs in personal social development opportunities.		
5. Health	The need for a fully functioning primary care centres and services	The goal relating to health is to promote 'healthy Celbridge' by	5. Increase the Primary Care provision in Celbridge
	Increasing concerns about mental health and access to supports		6. Increase the availability of mental health services and support in Celbridge

Chair: Stephen Johnston; Secretary: David Trost; Treasurers: Sean Darcy & Brian Carpenter.



Celbridge Community Council



Transport access to hospitals and availability of out of hours services

An increase in alcohol and drug misuse

The need to support independent living for people currently living in St. John of Gods St. Raphael's campus

increasing the provision and access to health services and supports within the community.

7. Increase the number of Health promoting programmes

8. Increase awareness, services and supports to people affected by alcohol and drug misuse

9. Support St. John of Gods St. Raphael's to carry out their work in community based settings

10. Increase affordable transport options to hospital.

6. Education & Training

Celbridge is at maximum capacity in terms of school places

There are no schools on the Delivering Equality of Opportunity in Schools (DEIS) programme

There is an increase in demand for training vocational and further education

Maynooth University is on the communities door step, it could be utilised more

The reduction in educational supports is having an impact

The goal relating to education and training is to support access to high quality education at all life stage.

11. Highlight educational disadvantage in Celbridge and the need designate DEIS status to schools with a cohort of disadvantaged students.

12. Improve planning for new schools as population growth continues

13. Support local primary and secondary schools to continue to provide high quality education, to access required supports to respond to emerging educational and social needs of children and families

14. Improve access to out of school education opportunities

15. Increase links between local schools and with Maynooth University

16. Increase access to Youthreach, Community Training Centres and other youth education services.

7. Community Facilities & Amenities

The high demand for participation in recreational groups, with a number of groups and clubs unable to accept new members

Accessibility to some centres

Challenges in sustaining and maintaining facilities

The limited size and scope of existing playgrounds

The absence of an outdoor play/recreation facility for preteen and teens

The lack of a suitable venue to stage arts performances.

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.

17. Maximise the full potential and support the sustainability of existing community facilities especially The Mill and ACRE project.

18. Develop existing and new play space targeting preteens/teens

19. Consider community facilities and amenities as a central component of town planning

20. Develop the existing library services

21. Support the development of Arts based initiatives for Celbridge.

8. Safety

While reductions in Garda numbers declined nationally, Kildare and Celbridge have particularly low levels of Gardaí

There are no Community Gardaí posts in Celbridge

The goal relating to policing and safety is to highlight the need for additional Gardaí and

22. Increase Garda presence and response to safety issues in Celbridge

23. Raise awareness for the need for specialist Garda posts including community Gardaí

Chair: Stephen Johnston; Secretary: David Trost; Treasurers: Sean Darcy & Brian Carpenter.



Celbridge Community Council



Increasing concerns about anti-social behaviour in Celbridge

High levels of crime and drug related activity in North Kildare in general and Celbridge in particular

resources in Celbridge.

24. Maintain and develop collaborative relationships with An Garda Síochana and the community

25. Raise awareness in relation personal safety

9. Tourism & Heritage

Opportunity to develop and maintain links with Castletown House

The need to continue to develop town maintenance and links to the businesses

Opportunity to promote key cultural and tourism interests within Celbridge

Scope to strengthen walking and cycling infrastructure to support tourism development.

The goal relating to tourism is to promote and support Celbridge as a key tourist destination within Kildare.

26. Support the development and implementation of a Celbridge Tourism and Heritage Strategy

27. Support the development of key tourist sites, Castletown House, The Abbey, Arthur Guinness trail

28. Promote local festivals and community events as a way of promoting tourism within Celbridge

29. Link with regional and national tourism opportunities to promote Celbridge as a tourist destination.

10. Enterprise & Employment

Many supports for small business enterprises are located centrally located in Naas

There has been a decline in local business and there have been numerous business closures across all North Kildare towns

Access to unemployment services is limited

Many local people shop in Dublin instead of locally in Celbridge.

The goal relating to enterprise and employment is to provide local supports to enable small businesses to establish and develop and for people to obtain the skills and training to secure employment.

30. Provide a range of skills development opportunities for smaller businesses to develop and grow in Celbridge.

31. Support the development of the Celbridge Business Association

32. Increase employment training, re-skilling and adult education opportunities.

33. Increase youth employment training opportunities.

11. Infrastructure & Transport

Dependence on cars as the main mode of transport

Traffic congestion in the town and at schools

Pay parking requirements in the town

Lack of awareness of bus times to Hazelhatch train station

No public transport to key towns within Kildare such as Leixlip and Naas

Gaps in cycle routes connecting estates to amenities

Areas in Celbridge can be prone to flooding.

The goal is to plan, develop and maintain Celbridge to have the infrastructure and transport to enable it to be a dynamic sustainable town.

34. Link with and inform the development of all relevant planning processes e.g. local area plan

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

38. Support initiatives to keep Celbridge town clean and tidy.

Chair: Stephen Johnston; Secretary: David Trost; Treasurers: Sean Darcy & Brian Carpenter.