



**Submission to An Bord Pleanála
Regarding Proposed SHD at
Townland of Crodaun, Celbridge, Co. Kildare
ABP Ref: ABP-306504-20**

February 2020



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The Mill Celbridge Community Centre
Celbridge
Co. Kildare
W23 P6P5

27th February 2020

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

Re: Case # 306504 - Strategic Housing Development Application for the construction of 372 no. residential units (218 no. houses, 154 no. apartments). Townland of Crodaun, Celbridge, Co. Kildare

Dear Sir / Madam,

As a representative voice for the community, Celbridge Community Council wishes to make a submission outlining our views on the above mentioned Strategic Housing Development (SHD) planning. Celbridge Community Council was established as a voluntary community group in 1975 and has since been actively involved in many aspects of community life in Celbridge. Our goal is to promote and improve community life and to influence in a positive way the physical development of the area for the benefit of all those who live and work there.

While the subject site for the proposed development is on the 67 Dublin Bus route, it is peripheral in nature relative to

- high capacity public transport facilities (4.5km of congested roads to train station) and
- the established core of Celbridge (2km from Main Street)

Celbridge Community Council acknowledges the demand for housing in Celbridge and supports the provision of same in a strategic manner that rectifies rather than exacerbates infrastructural deficits. However, Celbridge Community Council has a number of concerns. This submission

- highlights concerns about the **car dependent** nature of the proposed development and the unsustainable travel patterns this will give rise to – this will exacerbate already significant difficulties that residents from the north and west of Celbridge encounter both moving around the town (to access schools, services and community facilities) and accessing out-of-town locations (national road network and train stations)
- expresses concerns, in light of the peripheral location of the subject site, at the **appropriateness of the proposed density** relative to that specified for the Crodaun KDA in the Celbridge Local Area Plan 2017-2023
- emphasises that Celbridge is being categorised by Kildare County Council as a “**Self-Sustaining Town**” under the framework laid out by the National Planning Framework and EMRA Regional Spatial & Economic Strategy in recognition of its low ratio of jobs to resident workforce and that it requires contained growth



- questions how the **CSO1.2** Celbridge Local Area Plan 2017-2023 objective *“To support new residential development in Key Development Areas (KDAs) in tandem with the delivery of supporting physical and social infrastructure.”* is being realised as we see little evidence of this
- highlights some **concerns we wish An Bord Pleanála to examine** with a view to imposing conditions if development is to be permitted at the subject site.

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

Yours faithfully,

Liam O’Dwyer

Secretary

Celbridge Community Council



Context for Delivery of Infrastructure

We need to improve on how we deliver infrastructure in the context of **all developments in our town**.

The following to the north and west of Celbridge are at various stages in the process:

- Nearly **100** homes were constructed near Aldi in the last couple of years – many families have moved in already but there are a few more to come
- An Bord Pleanála permitted building of **251** dwellings at a peripheral location to the west of Celbridge last year - # ABP-303295-18 – site preparation works appear to have begun
- **372** dwellings are the subject of this application
- in the near future it is likely that another SHD application for **495** dwellings will come before An Bord Pleanála - An Bord Pleanála and ABP issued an Opinion on the 17th June 2019 stating that the proposed scheme represents a reasonable basis for an application (Ref. PL09.304246).

If An Bord Pleanála approves both proposals for the Crodaun KDA, the north and west of Celbridge may see a potential increase of **1,218 dwelling units** in the coming years. Each isolated development may not seem so bad in its own right but the combination suggests the need for some serious strategic thinking and controlled phasing of housing delivery in tandem with the dwelling units.

Absence of Transport Management Strategy

Celbridge's traffic and transport issues are well known but no measures have been taken to define a strategy with which to tackle them. Celbridge suffers from significant peak-hour congestion due to the volume of traffic that traverses the single bridge over the Liffey. The bottleneck at the bridge adversely affects all bus routes and access to Hazelhatch train station.

A town of almost 22,000 residents absolutely needs something other than a narrow 200 year old "horse and cart" bridge to facilitate movement from one side of the Liffey to the other. Pedestrians and cyclists need to be able to cross the Liffey safely and traffic needs to be able to cross without wasting 10-20 minutes queuing. Children need to feel safe using active travel modes to get to and from school, sustainable transport alternatives need to be available so people do not have to use their cars for their journeys and residents need to be able to get out of their estates in the mornings without a 10-15 minute queue.

This is not just the opinion of residents as the following authorities also raised concerns in submissions on the Draft Celbridge LAP 2017-2023

- The **Department of Housing, Planning, Community and Local Government** raised concerns about the phasing and delivery of strategic infrastructure needed for development in its [February 2017 letter to Kildare County Council](#).
- **Transport Infrastructure Ireland (TII)** raised concerns about the potential of development to the north and west of the town to generate significant traffic movements onto the junction of the R405/ R409 in proximity to Junction 6 of the M4. TII did not feel that individual applicant's **Traffic & Transport Assessments** could be taken as a substitute for undertaking a more strategic assessment of the capacity of the road network to accommodate the extent of development proposed in the plan. TII recommended that an evidence based transport assessment be undertaken to support development proposals and phasing set out for the KDAs.



Kildare County Council addressed the above concerns by introducing an objective in the Local Area Plan (MTO3.1¹) to prepare a **Transport Management Plan** and **Public Transport Strategy** within 12 months of the date of adoption of the Celbridge Local Area Plan 2017-2023. The expected completion date for this strategy was August 2018 so it is **now 18 months overdue** yet Kildare Country Council's pipeline still does not include work on this strategy.

Celbridge desperately needs strategic thinking and a clear framework for how transport infrastructure and services will support the sustainable growth and development of the town. Until an impartial analysis of the transport problems has been performed and the accompanying recommendations have been incorporated into the LAP, Celbridge needs protection from piecemeal development. Developers produce their Traffic & Transport Assessments in isolation but, without a good grasp of the wider context, any or all developer's TTAs may downplay the impact that their development will have on the town. Celbridge Community Council questions the rationality of allowing development on this scale to proceed in Celbridge until the gravity of the concerns raised by the Department and TII are satisfactorily addressed by Kildare County Council and the NTA.

This application was planned in the absence of a Transport Management Strategy and there is insufficient evidence in the applicant's **Traffic & Transport Assessment (TTA)** regarding the impacts that the proposed development will have on the existing acute traffic issues throughout the town.

Question: Unless Kildare County Council compiles a Strategic Transport Management Plan, how can we understand the impact of development both at this location and the cumulative impact of developments to the north and west of Celbridge and how can the following Core Strategy objective be realised?

CSO1.2 Celbridge Local Area Plan 2017-2023 objective *"To support new residential development in Key Development Areas (KDAs) in tandem with the delivery of supporting physical and social infrastructure."*

Action: Celbridge Community Council requests that An Bord Pleanála defers making a decision on this application until a comprehensive independent traffic assessment is performed within the context of a Strategic Transport Management Plan.

¹ **MTO3.1:** To seek to prepare, within 12 months of the date of the adoption of the Celbridge Local Area Plan, a Transport Management Plan and Public Transport Strategy for Celbridge to support the sustainable growth and development of the town and to identify strategic connections for pedestrian, cyclist, bus, vehicle movement and links to the railway stations in consultation with statutory agencies, key stakeholders and the local community. Upon completion, the recommendations of the TMP shall be integrated into the LAP by way of a statutory amendment, where appropriate



Accuracy of Applicant's Traffic & Transport Assessment

Points raised in this section summarise an analysis prepared by local traffic and transport engineer Jason Walsh BE (Hons) CEng MIEI. He includes it as part of his own submission to An Bord Pleanála and we also include a copy of his report.

- Section 5.2 of the applicant's TTA report lacks a robust and accurate trip generation assessment for the proposed development because it includes TRIC survey location categories that are not applicable to the subject site. The result is a flawed traffic analysis due to the lower trip generation assigned to the development. The survey locations that should have been excluded from the analysis are "Edge of Town Centre" & "Neighbourhood Centre" / "PPS6 Local Centre". The proposed development location only falls into two TRIC location categories (Suburban Areas & Edge of Town) so these are the only two that should have been included in the analysis. A revised TRICS analysis using only the Suburban Areas & Edge of Town location categories would show higher trip generation for the development than does the analysis included in the TTA report. Additionally, by utilising the trip generation data for the neighbouring development, Crodaun Forest Park and assigning this to the proposed development, the analysis would have produced more accurate real-world trip generation projections.
- Section 5.3 of the applicant's TTA report fails to acknowledge the attraction of development traffic to/from Maynooth Road (South) that can be observed on examination of the Crodaun Forest Park traffic counts. This makes sense given the edge of town location.
- As stated in Section 6.0, the only junction south of the proposed development to be analysed was the R405-Maynooth Rd / Crodaun Forest Park junction.

Action: Celbridge Community Council requests that

- A. the TRICS analysis be revised to show more accurate trip generation from the proposed development by
 - only including Suburban Areas & Edge of Town location categories
 - using trip generation data for the neighbouring development, Crodaun Forest Park and assigning this to the proposed development
- B. analysis be performed on, at least, the following junctions in acknowledgement of the higher attraction towards Celbridge town
 - R405-Maynooth Rd / Aghards Road Signalised Junction
 - R405-Maynooth Rd / Shackleton Road Signalised Junction



Car Dependency

The subject site is indisputably at a peripheral location relative to high capacity public transport facilities and the established core of Celbridge. This will inevitably result in unsustainable travel patterns.

The site is 2km north of the Main Street in Celbridge and is 4.5km north of Hazelhatch/ Celbridge train station on heavily congested roads.

- **Note:** the applicant's [Planning Report & Statement of Consistency](#) erroneously states that "*The nearest train station is Celbridge/Hazelhatch, approximately 3km from the site*").

Celbridge is a heritage town that grew from a small estate village and many of its roads cannot be altered to prioritise buses. The traffic congestion problem is set to worsen until a modal shift is achieved on the back of enhanced public transport and transport infrastructure (a second bridge and accompanying road network) can be delivered for the town.

Approximately 48% of workers from Celbridge work in Dublin city & suburbs and **almost 70% of these rely on cars for their commutes to Dublin**. This level of car dependency reflects the difficulties that commuters from Celbridge experience availing of public transport services. In a town that is supposed to be part of the Dublin Metropolitan Area, this level of car dependency is ludicrous and is increasingly contributing to deterioration of quality of life for residents of the town. The commute from Celbridge to work / college is already arduous for many. It takes way longer than the 30-40 minute limit beyond which negative mental health implications can be observed. Celbridge is one of the towns with the highest percentages of commuters who commute for more than an hour (18.6%)². Most residents are already very selective about where they would consider working or studying due to commute times but journeys of 70-75 minutes each way are not uncommon.

It is noted that the applicant's [Traffic & Transport Assessment](#) establishes a requirement for a total of 721 car parking spots based on Kildare County Council's requirements but the applicant plans to provide 633 spots. Even with 633 car parking spots, the development is dense with buildings and car parking and very little by way of green spaces.

Commuters: Public Transport versus Car

Though served by the **67 Dublin Bus route**, bus journey times from the subject site to Dublin city can easily exceed 75 minutes³. Without provision of frequent, reliable and speedy bus services, the site's proximity to M4 Junction 6 will result in the convenience of driving triumphing over taking the bus.

This area of Celbridge currently only has bus connections to Maynooth and Dublin (via Celbridge town centre, Lucan, Liffey Valley, Palmerstown, Chapelizod and the quays). BusConnects network redesign proposals would enhance bus connectivity but *they are not guaranteed to happen* and, even if they do happen, they will only scratch the surface in terms of connectivity to places that people need to go.

Rail services are an attractive option for commuters whose destinations are served by the rail lines. However,

- there is insufficient capacity on rail services from North Kildare until roll out of additional carriages and, even then, it's unlikely to be enough to meet the demand

² <http://www.cso.ie/en/releasesandpublications/ep/p-cp6ci/p6cii/p6td/>

³ One Celbridge resident describes his journey to Baggott Street on the Express 67X bus: "*It currently takes an hour and a half to get from Celbridge to Baggott Street Bridge on the 67X in the morning.*"



- the time needed to get to and from the station is too unpredictable due to traffic congestion
 - a greater frequency would ensure that commuters do not have long delays waiting for a train if they miss the train they were originally targeting
 - additional trains starting in Hazelhatch would ensure that passengers could commute in comfort
 - improved infrastructure in Celbridge, in particular a second bridge over the Liffey, would shorten the time needed to get to the train station

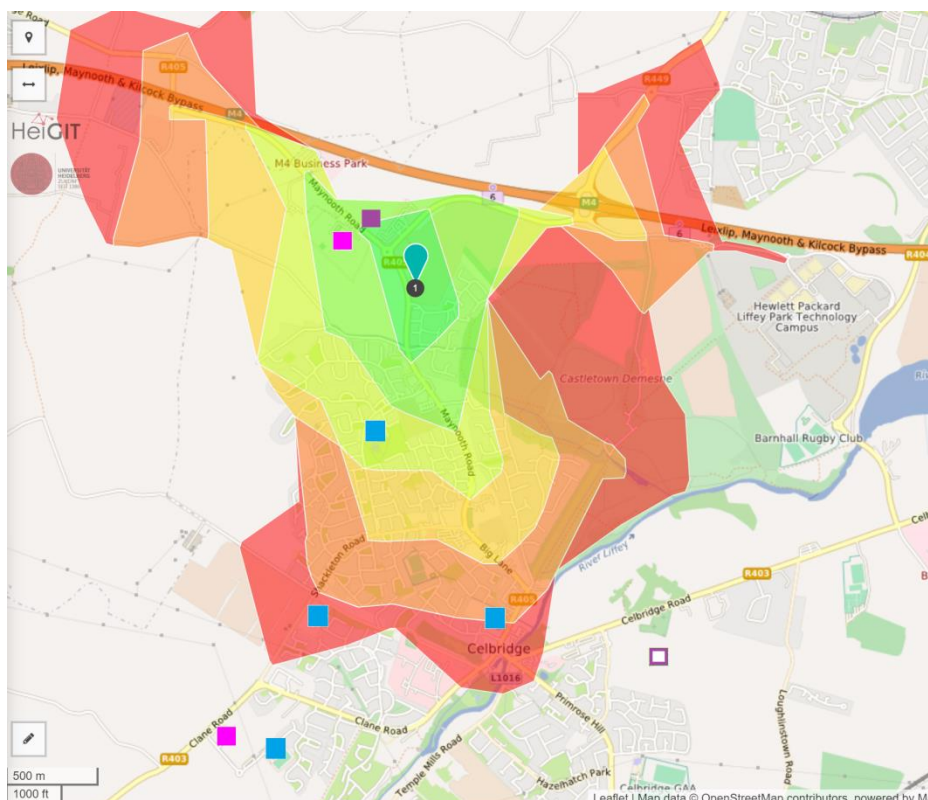
Schools: Active Modes versus Car

This development is very poorly located for access to primary schools and, once the temporary Celbridge Community School (which has planning permission for the temporary school buildings until February 2021) relocates to a permanent location at the much needed new Education Campus, the subject site will be poorly located for access to both of the secondary schools that girls can attend – the site is 3.2km from St Wolstan’s Celbridge Community School and 3.1km from the proposed site of the permanent Celbridge Community School (on the Education Campus behind Donaghcumper Cemetery).

This [map generated from openrouteservice](#) shows pedestrian isochrones from the proposed development site.

The colours from green to red represent 5, 10, 15, 20, 25 & 30 minutes walking distances).

Range	Area
5 min	0.26 km ²
10 min	0.98 km ²
15 min	1.80 km ²
20 min	2.80 km ²
25 min	4.40 km ²
30 min	6.90 km ²



Coloured boxes represent the location of schools as follows:

- **solid blue boxes** to mark the locations of the **closest primary schools**
 - only one of the primary schools, Scoil Mochua, is an attractive distance from the subject site for active modes (approximately a 15 minute walk) but has traditionally been oversubscribed



- Scoil Naomh Brid (girls only) on the Main St and Scoil na Mainistreach are both much further away, 25-30 minutes so will encourage car journeys
 - North Kildare Educate Together is well outside the isochrones but is probably a 45 minute walk away so again will encourage car journeys
- **solid pink boxes** to mark the locations of the two **permanent secondary schools**
 - the Salesian College (boys only) is approximately a 10 minute walk away
 - St Wolstan's Community School (girls only) is approximately a 40 minute walk away
- a **solid purple box** to mark the location of the **temporary Celbridge Community School**
 - the temporary Celbridge Community School is approximately a 10 minute walk away but this will be irrelevant when the school moves to the other side of the Liffey – the current planning permission for use of this site as a school expires in February 2021
- a **white box with purple outline** (south-east) to mark the proposed location of the future Education Campus (this will hopefully be the site for three permanent schools - Celbridge Community School, St. Patrick's National School and St. Raphael's Special School once "technical issues" with the site are resolved).
 - The Education Campus will be approximately a 40 minute walk away

Options?

Limiting car parking spaces is an approach to promoting sustainable travel patterns but the degree to which parking spaces can be successfully limited differs depending on how strategically the site is located. In order to successfully restrict car ownership and carbon emissions, sustainable travel options need to be available for residents but as of now, public transport provision is inadequate at this location.

Public transport must be a key consideration here. The Crodaun Area is not a transport node. Until the NTA makes significant progress on the provision of public transport services, significant development at the subject site seems premature.

Actions:

- Celbridge Community Council requests that An Bord Pleanála defers making a decision on this application until a sustainable transport strategy is in place including
 - Infrastructure to incentivise active modes of transport - consideration might be given to requiring the applicant to contribute to the enhancement of cycling infrastructure and footpaths to encourage active modes of transport between the subject site, the town centre and schools
 - The making of a solid commitment by the NTA (including a budget allocation and mobilisation of staff to ensure that it happens) to roll out the proposed new W8 and 259 BusConnects routes (or equivalent). These proposed bus routes are not dependent on other routes in the Dublin Metropolitan Area but are essential for the subject site to develop in a sustainable manner.
- Once more bus services serve the site, consideration could be given to reducing car parking spaces.



Housing Density given Peripheral Location of Site

The proposed housing density is excessive given how far the location is from the town-centre and from the train station. At 40.5 units per hectare, it is 10.5 units per hectare higher than the maximum that was specified in the Local Area Plan for this site.

The Celbridge Local Area Plan 2017-2023 states that

"This site will accommodate medium to low-density residential development in the order of 25 units per hectare. However, where the quality of the design and layout is particularly high, a maximum density of 30 units per hectare may be achievable."

Higher densities make sense where the development is close to a transport hub / high quality transport corridor but the subject site is as far as you can get from the train in Celbridge and journey times by bus just don't cut it. Since there are no plans to enhance services and amenities in this area of town, the chosen density is inappropriate.

Action:

- Celbridge Community Council requests that An Bord Pleanála either reduces the density at the subject site or defers making a decision on this application until a solid commitment (including a budget allocation and mobilisation of staff to ensure that it happens) is made by the NTA to roll out the proposed new W8 and 259 BusConnects routes (or equivalent). These proposed bus routes are not dependent on other routes in the Dublin Metropolitan Area but are essential for the subject site to develop in a sustainable manner.

Delivery of Physical & Social Infrastructure

Traffic and Transport issues have already been addressed to some extent but there are a myriad of other physical and social infrastructural deficits in Celbridge – these include insufficient childcare provision, lack of play space for teenagers, three schools awaiting permanent premises on an increasingly elusive Education Campus, lack of youth services, lack of a Family Resource Centre, lack of cycle tracks on school routes, lack of a cycle track between Celbridge and Maynooth, etc.

The EMRA Regional Spatial and Economic Strategy has requirements on social infrastructure. While these may not be binding until the LAP is varied or replaced, the requirements do not appear to clash with anything in the LAP so leveraging the fresh approach would seem prudent. The RSES appears to give guidance on ways to achieve the requisite levels of social infrastructure for any given location.⁴

A significant amount of analysis was already completed under the Celbridge Integrated Services Programme Plan 2016-2020.

Actions:

- Celbridge Community Council requests that a social infrastructure audit be completed to guide Kildare County Council in delivery of infrastructure for the potential 1,218 dwelling units in the north and west of Celbridge.
 - This would guide discussions with the Department of Education regarding provision of both primary and post-primary school places for the new residents.

⁴ RPO 9.19: EMRA shall work collaboratively with stakeholders including the wide range of service providers through the LECs to effectively plan for social infrastructure needs



- This should include needs analysis for childcare using more robust methods that querying childcare providers
- This should build upon analysis performed under the Celbridge Integrated Services Programme Plan 2016-2020.
- The applicant should, in collaboration with Kildare Country Council, be compelled to take measures to realise the following Core Strategy objective
CSO1.2 Celbridge Local Area Plan 2017-2023 objective *“To support new residential development in Key Development Areas (KDAs) in tandem with the delivery of supporting physical and social infrastructure.”*

Celbridge as a Self-Sustaining Town

Celbridge is categorised by Kildare County Council as a **“Self-Sustaining Town”** under the framework laid out by the National Planning Framework and EMRA Regional Spatial & Economic Strategy - this is remarkable for the third largest town in Co. Kildare but it reflects the reality that Celbridge has *“undergone rapid commuter-focused residential expansion over the recent decade, without equivalent increases in jobs (i.e. settlements characterised by a **low ratio of jobs to resident workforce**) and services”* and that it requires *“contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery”*. This definition reinforces that the challenges for Celbridge are recognised by planning authorities though it does not inform how containment of growth will be managed or how the targeted catch-up investment might happen whilst balancing housing delivery. Careful consideration is hence warranted around how each housing application can present an opportunity to enable said catch-up & help to deliver the significant transport infrastructure required for Celbridge.

Childcare

The proposed development at the subject site plans to provide a childcare facility for the bare minimum number of children.

- **Number of dwellings:** 316 (372- 56 one-bedroomed apartments)
- **Rate of required provision (CDP):** 20 places per 150 dwelling units (LAP requirement)
- **Required provision for 316 dwellings:** 42

This minimum provision of childcare places deviates from the guidelines of 20 places per 75 dwelling units (**Section 2.4 of Childcare Facilities – Guidelines for Planning Authorities 2001**) as a pattern of over-provision was observed so Kildare County Council set its own guidelines in its County Development Plan. However, this pays no heed to the fact that Celbridge and neighbouring towns in North Kildare currently experience acute shortages of childcare places; places for babies and after-school places are particularly challenging to source and families from Maynooth and Leixlip are “taking places” in Celbridge due to lack of provision in their own towns making it impossible for Celbridge families to source childcare locally. Many members of the community have experienced significant issues sourcing suitable childcare arrangements in Celbridge over the last decade and many children are being minded in less than ideal situations.



It is a mistake for the developer to limit childcare provision to just what is required in the LAP believing that usage of the crèche will primarily be by residents of the development. Many areas of Celbridge have no childcare facilities so must travel to other areas or towns. Once opened, the crèche is likely to fill up with children from outside of the proposed development so additional spaces will be needed in order for residents of the development to be able to get places for their children as they move into the development. It would thus be more prudent to plan for a larger facility to be opened on a phased basis. Expansion of the facility should track demand for places as new families move into the development.

On liaison with Kildare County Childcare Committee (KCCC) we discovered that beyond the ECCE scheme, KCCC cannot advise what the demand for childcare places is versus the number of available childcare places. They did confirm what we have heard from residents throughout the community – i.e. there is undersupply of baby and after-school places. Provision of childcare in Celbridge has just not kept pace with demand. Parents needs to be surveyed in addition to childcare providers to understand the full picture. See attached letter from Kildare County Childcare Committee.

As advised by Kildare County Childcare Committee, regarding design factors it is essential that any designs for future crèche/ childcare facilities take account of the Universal Design Guidelines - see <https://aim.gov.ie/universal-design-guidelines-for-elc-settings/>.

Actions:

- Celbridge Community Council requests that the applicant be required to make provision for childcare facilities at a level that reflects the greater need in the town rather than the minimum level.
- Celbridge Community Council suggests that the Universal Design Guidelines for future crèche/ childcare facilities be adhered to

Medical

There is a huge shortage of GP practices taking on new patients in North Kildare and Lucan. A number of GPs in Lucan recently retired and patients seeking a GP in Lucan were directed to the most recently opened practice in Celbridge (the only known practice that was taking on new patients). There are similar pressures for GPs in the neighbouring towns of Leixlip and Maynooth.

Actions:

- Celbridge Community Council requests that demand for GPs be established and that the applicant be required to make provision for a GPs practice at Crodaun.

Pedestrian Access to the site

A number of access points to the site are labelled "*Possible Future Pedestrian Access*" on the Landscape Masterplan but are more promisingly labelled as "*Proposed Pedestrian/ Cycle Link to Existing Facilities*" on the Overall Roads Layout. Hopefully the latter reflects the intention but it is worth reiterating that permeability must be built in from the start to avoid future strife.



Actions:

Celbridge Community Council requests that

- there should not be any restrictions that would block a cargo bike, a side-by-side double-buggy or a wheelchair passing through
- Permeability should be properly planned and not narrow alleys in order to minimise the risk of anti-social behaviour.
- A proper pedestrian crossing must be provided on the R449 to facilitate safe crossing over between the subject site and the Apple Green service station/ Playzone, etc.

Leisure / Play Space

The proposed development falls short of the 15% open-space provision but what has been provided will benefit from passive surveillance. The open space does feel very limited and provisions for play equipment are unclear. The "[landscape details planting play file](#)" shows some lovely equipment and nature based/ imaginative play ideas. The [Landscape Masterplan](#) shows nature based play areas in 2 pocket parks (at both of the apartment blocks) but the [planning report statement of consistency](#) only proposes this for the northernmost pocket park. Not all children will be interested in kick-about pocket parks so it would be better to provide the play equipment in two as per the Landscape Masterplan. The "[landscape details planting play file](#)" file states that the equipment is for ages 2-6 but provisions for older children/ teens should be made. This is seriously lacking in the town so is a big problem in Celbridge generally.

The crèche facility may be used in part as an afterschool childcare facility so play equipment adjacent to it should be suitable for both 3-6 and 6-12 year olds. Provision for adult play/ exercise equipment within the development would also be welcomed.

Actions:

Celbridge Community Council requests that

- Consideration be given to requiring play equipment for ages older than 3-6 years old (6-12 years old, teenagers and adult exercise equipment) – perhaps applicant liaise with Kildare County Council Parks Department regarding to understand the best types of facilities to provide as they will have a better understanding of the play equipment deficits in Celbridge

Conclusion

Celbridge Community Council requests that An Bord Pleanála defers making a decision on this application until it is supported by the infrastructure and services needed to be a truly sustainable development.