



**Submission to An Bord Pleanála
Regarding Proposed SHD at
Townland of Crodaun, Celbridge, Co. Kildare
ABP Ref: ABP-307100-20**

June 2020



Liam O'Dwyer
Celbridge Community Council
The Mill Celbridge Community Centre
Celbridge
Co. Kildare
W23 P6P5
28th June 2020

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

Re: Submission on Proposed Strategic Housing Development at Crodaun, Celbridge, Co. Kildare

Reference: ABP-307100-20 / Case # 307100 - Strategic Housing Development Application for the construction of 467 no. residential units (199 no. houses, 216 no. apartments, 52 no. duplexes), childcare facility and associated site works. Lands on west side of Maynooth Road (R405) and north of Kilwogan Stream, Crodaun, Celbridge, Co. Kildare.

Dear Sir/ Madam,

As a representative voice for the community, Celbridge Community Council wishes to object to the scale of the proposed Strategic Housing Development (SHD) planning application. 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.

Celbridge Community Council acknowledges the demand for housing in Celbridge and supports the **provision of housing in a strategic manner** that rectifies rather than exacerbates infrastructural deficits. However, Celbridge Community Council has a number of concerns in relation to the following key areas:

1. traffic and transport
2. deficits in social and community infrastructure
3. the design of the proposed development
4. existing problems with utilities
5. environmental and heritage concerns

Despite having the third highest population in Co. Kildare after Newbridge and Naas, Celbridge is designated as a **Self-Sustaining Town** under the new planning framework. This recognises 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*”. If Celbridge expands too rapidly now, the required catch-up will never happen and issues will be further exacerbated.



It is our belief that large-scale development as proposed is inappropriate and that the applicant should be compelled to revisit their design and submit an application for development at a scale that is appropriate given the town's current infrastructural capabilities and the character of area in which the subject site is situated. The following Celbridge Local Area Plan 2017-2023 Core Strategy objective must be realised:

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

This submission draws on the findings of a survey conducted by Celbridge Community Council in June 2020. This survey asked existing residents a number of questions regarding the infrastructural impact of development at Crodaun. The concerns addressed in the submission broadly reflect the concerns expressed by residents in their responses.

We trust that An Bord Pleanála will carefully consider our concerns regarding this SHD application and either refuse permission entirely or grant partial permission with conditions in a manner that will protect 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



1. Traffic & Transport

Traffic congestion is a serious issue for drivers, bus users, cyclists and pedestrians alike. Celbridge is a heritage town that grew from a small estate village and the narrow roads cannot be altered to prioritise buses. Celbridge suffers from serious peak-hour traffic congestion due to the volume of traffic that traverses the single narrow bridge over the Liffey every morning and evening. The bottleneck at the bridge negatively impacts passengers on all existing bus routes and impedes access to Hazelhatch train station from the north of the town. The traffic congestion problem is set to worsen until a second bridge and accompanying road network can be delivered for the town.

1.1 Traffic & Transport Submission

In response to the NRB Transportation Assessment Report submitted by the applicant finding that

“there are no significant adverse traffic/transportation capacity or operational issues associated with the construction and occupation of the residential development as now proposed”

Celbridge Community Council compiled a **Traffic and Transport Submission**.

This **Traffic and Transport Submission** illustrates the gravity of transport infrastructure deficits in Celbridge and the impact of inadequate transport infrastructure on residents, and raises multiple significant grounds of objection. The **Traffic and Transport Submission** (Appendix A) should be read in conjunction with (and further to) this submission.

The report concluded that the application is lacking in a number of areas chiefly, traffic assessment, conformance with DMURS standards, compliance with LAP Objectives and road safety and that it would thus be appropriate to refuse permission to this SHD application based on the items noted in Section 2 of the report. Many of these are too significant to address in planning conditions alone and may require significant redesign of the development to address them.

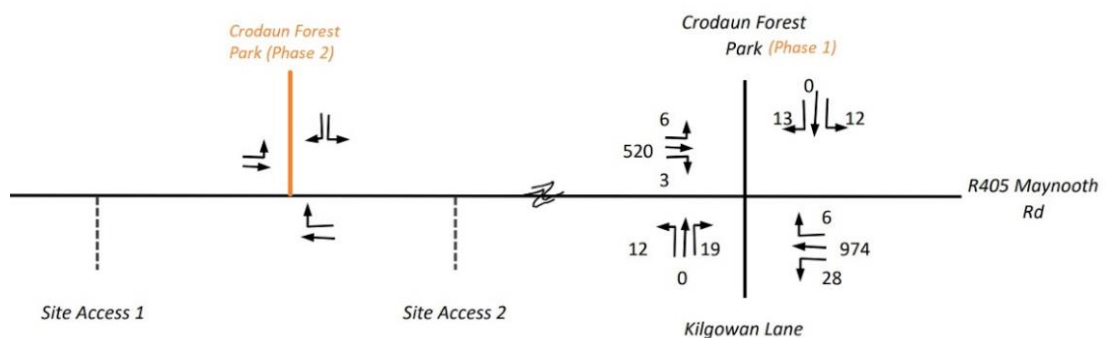
The following summarises the findings of our **Traffic and Transport Submission** (using section numbers from the report) are as follows:

- 2.1** There is a lack of delivery of significant roads and transport infrastructure improvements in the Celbridge area to support the addition of new large-scale residential developments in Celbridge
- 2.2** The predominant modes of transport from the subject site would be by private modes with minimal use of green modes
- 2.3** The absence of a **Transport Management Plan** and **Public Transport Strategy** (Local Area Plan Objective MTO3.1 overdue since 2018¹) means that
 - There has been no strategic assessment of the capacity of the road network and its capacity to accommodate the extent of development proposed in the plan – individual applicants’ Traffic and Transport Assessment cannot be taken as a substitute for this

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



- There are no timelines for the provision of key infrastructure and public transport improvements.
 - Approval of large-scale developments in Celbridge without understanding the network's capacity or knowing key timelines for infrastructure and service improvements will have a detrimental impact on the sustainable growth and development of Celbridge
- 2.4** It cannot be established that the Traffic Impact Assessment carried out by NRB adheres to Kildare County Council's requirements as there is **no evidence of a scoping study document**
- Appropriate scoping of the Traffic Impact Assessment would most likely have required the inclusion of two significant junctions in Celbridge Town (Aghard's Road signalized junction and Shackleton Road signalized junction).
 - The Celbridge River Crossing Feasibility Report carried out in May 2015 included an assessment of the Shackleton Road signalised junction, and showed two arms of this junction **operating at close to capacity in 2019**. Additional development traffic would most likely push this junction over capacity.
 - Failure to include the Aghard's Road and Shackleton Road junctions in the Traffic Impact Assessment greatly **underestimates development traffic impacts on these junctions**.
- 2.5** The NRB Transportation Assessment report **fails to state when the 2019 traffic survey data was captured** so it is not possible to discern if the data used corresponds with appropriate peak periods for the local network (Tuesday-Thursday during the school year) as recommended by the by Traffic & Transport Assessment Guidelines, NRA 2014
- 2.6** The NRB Transportation Assessment lacks a robust and accurate trip distribution assessment for the proposed development and **fails to account for the attraction of development traffic to/from Celbridge** via Maynooth Road (Southbound).
- 2.7** The NRB Transportation Assessment presents an incomplete analysis of the impact on the Crodaun Forest Park Phase 1 and Phase 2 junctions
- The report **failed to address the development traffic impacts on the Crodaun Forest Park Phase 2 access junction** (annotated in orange in the diagram below) at all. Crodaun Forest Phase 2 is the larger of the two development phases with 229 houses as compared to 69 houses in Crodaun Forest Phase Phase 1. The report only checked the impact on the Crodaun Forest Park Phase 1 & Kilwogan Lane junction





- While the NRB Transportation Assessment report included the **Crodaun Forest Park Phase 1 access junction**, it **failed to account for existing delays in the traffic assessment of this junction**. Responses to Celbridge Community Council's survey in June 2020 highlight lengthy delays but NRB's analysis does not accurately model the impact on this junction and the increased delays due to the development traffic.
- 2.8 A high-level assessment of the development traffic impact on the Aghard's Road junction using
 - a more accurate trip distribution assessment that recognises the attraction of development traffic to/ from Celbridge (see 2.6)
 - traffic counts for the junction from planning application 16260 for the Castlewella estate suggests that the 5% threshold for sensitive locations would be exceeded so this junction should have been included in the traffic assessment for this application.
- 2.9 Despite the design concept for the Crodaun KDA (Figure 12.3 in LAP) including a landscaped buffer with cycle path/ walkway through a "linear park" between the R405 and housing development, the applicant's proposals omit this landscaped buffer and cycle path/ walkway. The design concept offered a solution to the reality that hundreds of post-primary students traverse the route every morning and afternoon on a cycle path that is 0.5 – 1m too narrow for the level of peak-time activity. The applicant's proposal does not even propose to upgrade the footpath and cycle paths along the frontage of the development but it is essential that fit for purpose infrastructure is put in place here.
- 2.10 The LAP has an objective (MTO1.2) to facilitate the provision of routes identified in the Greater Dublin Area Cycle Network Plan. Since the subject site adjoins a feeder route marked on Sheet N16 of the Greater Dublin Area Cycle Network Plan and on LAP Map 8.1, provision should have been made for this (most likely within the subject site to avoid impact on ecology).
- 2.11 The scheme design does not comply with DMURS as the proposed street layout fails to provide a safe low speed environment for the safe integration of vehicles, cyclists and pedestrians.
- 2.12 Eight safety issues were identified in relation to the existing road network so the Road Safety Audit submitted with the application is flawed.
- 2.13 The proposed development does not provide connection to the boundary to allow connections with adjoining lands to ensure the possibility of delivering permeability in the future.
- 2.14 The design of the natural ecological park and the northwestern corner of the housing development should be evaluated in relation to the future provision of a link road and a potential design submitted for its operation with the road link in place. The link road is the one we believe will inevitably need to be constructed following a feasibility study to explore "the potential to construct a Western Link Road that will link Maynooth Road R405 with the Clane Road R403 (LAP Objective MTO3.11).



1.2 Car Dependency

It is worth reiterating the reasons why **car dependency** amongst residents of the proposed development would be high:

- The subject site for the proposed development is peripheral in nature relative to high capacity public transport facilities (4.5km to Hazelhatch and 4km to Louisa Bridge train stations) so **residents from this part of town are not heavy users of rail.**
- The subject site is adjacent to the 67 Dublin Bus route but
 - the all-day **67 is not a high frequency bus service**
 - journey times are arduous** - residents from this part of town typically require in excess of 75 minutes to get to work in Dublin² with the first 20-25 minutes of the journey spent queuing just to cross the bridge in Celbridge. In contrast, residents who slip out onto the M4 from Crodaun could be passing Palmerstown in the time it takes a bus just to cross the bridge in Celbridge.
 - The 67X and 67 buses are unreliable options due to **insufficient capacity in the afternoons/ evening** for the return journey from Dublin to Celbridge - residents are **attracted towards driving** due to the risk of being stranded for 1 - 1.5 hours trying to get on a bus anywhere from Westmoreland Street to Lucan.
- The closest primary school to the subject site has operated at capacity for years so the expectation is that residents of the proposed development will need to **travel at least 2.1km to other primary schools in the town.** Car dependency for primary school runs will be very high from this location.
- When Celbridge Community School relocates from its temporary location north of the subject site, only post-primary boys attending Salesian College will be within reasonable walking/ cycling distance of their school. **All post-primary girls will need to travel 3km from the subject site to St Wolstan's Community School on the Clane Road or to the permanent Celbridge Community School on the Dublin Road.**
- There is **no guarantee that the proposed new bus routes under the BusConnects network redesign will ever happen** and, even if they do, the bus connection to Leixlip will not serve Intel, Leixlip Amenities Centre, Louisa Bridge train station, etc. **No analysis has been completed to ascertain what Leixlip destinations would be most beneficial for residents of Celbridge**
- Census 2016 data** showing the **modes of transport used** for travel to Work and School or College from four Small Areas in this part of North Celbridge³ confirms the level of car dependency:

		Work	School or College
Active Modes	On foot	2.54%	13.86%
	Bicycle	0.68%	9.74%
	Total Active Modes	3.21%	23.60%
Public Transport	Bus	13.54%	25.09%
	Train	2.03%	1.12%
	Total Public Transport	15.57%	26.22%
Car / Van	Car driver	65.31%	6.37%
	Car passenger	3.38%	38.58%
	Van	4.91%	0.00%
	Other (incl. lorry)	0.17%	0.00%
	Total by Car/ Van	73.77%	44.94%
	Motorcycle or scooter	1.02%	0.37%
	Work mainly at or from home	4.74%	0.37%
	Not stated	1.69%	4.49%

² 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."

³ Small Areas 087023009, 087023010, 087023045 & 087023049



Action: Celbridge Community Council requests that An Bord Pleanála refuses this SHD in its current form in light of the items noted in Section 2 of the Traffic & Transport Report (Appendix A). Many of the issues are too significant to address in planning conditions alone and may require significant redesign of the development to address them. It would be best for the applicant to defer making another application until such a time as a comprehensive independent traffic assessment has been in the context of a Strategic Transport Management Plan.



2. Social & Community Infrastructure

2.1 Acknowledged Deficits

While Traffic and Transport issues are so significant that they tend to overshadow everything else, there are a myriad of other physical and social infrastructural deficits in Celbridge. These deficits 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.

Given the insufficient levels of social & community infrastructure to cater for the existing population, Celbridge will be unable to cope with a surge in population.

Kildare County Council and the community alike recognise these deficits.

- Kildare County Council performed a Social Infrastructure Audit as part of the recent variation to the Kildare County Development Plan 2017-2023 and this highlighted the severity of the social infrastructure gaps.
- Kildare County Council performed research for the Celbridge Integrated Services Plan 2016-2020 in 2014-2015. This identified very many issues which have yet to be addressed.
- Responses from the survey conducted by Celbridge Community Council in June 2020 regarding the infrastructural impact of development at Crodaun highlight the areas where the community feels that services and facilities are most lacking.

Actions:

- Celbridge Community Council recommends that An Bord Pleanála leverages to the maximum the experience and insights of both members of the community who live with these deficits every day and of Kildare County Council who have researched provision of social infrastructure and identified gaps.
- The applicant should, in collaboration with Kildare County 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.”*

2.2 Survey Conducted by Celbridge Community Council in June 2020

The charts in Appendix C represent the responses to the survey questions regarding social and community infrastructure. There were no surprises in the answers from residents but, for the benefit of An Bord Pleanála, here is an overview of the responses:

- **Infrastructure for Movement**
 - Residents clearly recognise the issues pertaining to the fact that there is **no infrastructure for bus prioritisation**
 - **Walking and cycling infrastructure** is widely regarded as **poor**



- **Recreational Space & Amenities**

- Residents overwhelmingly recognise the lack of **free to use outdoor spaces for our young people** (outside of sporting clubs, paid activities, etc.)
- Residents feel that the existing **playgrounds** for children are inadequate – unless you live within walking distance of Willowbrook Park, there is no other option as the playground in Celbridge Abbey is accessed through private grounds which are rarely open to allow the public through - many travel outside of Celbridge to access playgrounds
- Many highlighted the **lack of green spaces / parks / recreational spaces other than the grounds of the OPW owned Castletown House**. Residents are crying out for recreational facilities that the OPW will never provide on OPW owned lands so public parks with facilities on a par with those provided in parks elsewhere in the country are essential. Additionally, Castletown House is difficult to access from the west and south of Celbridge for families with young children because the journey to it is unsafe for cycling with children and the distance is too far to walk.
- While we have some good **sports grounds / pitches** in Celbridge, they are **poorly located** for many so give rise to significant access issues
- Places in sporting and non-sporting clubs and activities can be difficult to source with long waiting lists

- **Community spaces**

- Residents feel that our town could do a lot better on **community spaces**
- there is acknowledgement that the OPW owned Castletown House caters somewhat to the needs for **performing arts spaces** and **arts and culture** but what they offer is limited and no substitute for designated spaces in the heart of our community

- **Accessing Services**

- **GPs** are very hard to source
- **Mental Health** services are hard to source
- Sourcing **Family, Youth & Community Support** has been an actual problem for the survey participant or they believe it to be a problem from what they hear in the community
- The **Garda Station operates on very limited hours** (only open to the public 3 hours per week) and the **presence of Gardaí in the community is low**

- **Childcare**

- **Sourcing childcare** (across all ages from babies to afterschool care) has been an actual problem for the survey participant or they believe it to be a problem from what they hear in the community

- **School Places**

- **Sourcing Primary school places** within walking distance has been an issue for many - we know that there is some capacity in the town but it is so far away from where children live that it encourages car usage to get there
- **Sourcing secondary school places** have also been an issue for many - the biggest issues now may relate to overcrowding in Celbridge Community School and the fact that post-primary students from south of the river have to travel so far to get to school



- **Pupil-teacher ratios** in many Celbridge schools have been amongst the highest in the country for years with many schools operating in crowded conditions which will, of course, pose challenges for social distancing

2.3 Recreational & Amenity Spaces

Facilities that residents repeatedly called for in their responses to open questions in the survey were as follows:

- Swimming Pool
- Public Skate Park
- Public Ball courts (Basketball, Tennis, Squash, etc.) / Multi-Use Games Area (MUGA)
- Public Playing Fields at convenient locations
- Public Sports & Leisure Centre at accessible location
- Bike Park / BMX Track
- Outdoor Gym Equipment
- Larger and more playgrounds
- Running Track
- Hangout Space for Young People

Residents must travel significant distances to avail of these facilities. This is unsustainable, as parents would need to be available to drop young people to these facilities. Facilities are essential to channel young peoples' energies into constructive activities.

Question:

- How many towns in Ireland with a population approaching 22,000 have neither easy access to a swimming pool nor free outdoor space where young people can congregate to exercise and/ or socialise?

2.4 School Places

Celbridge Community Council disagrees with the following from the applicant's School Demand Statement

- *"Celbridge is well served in terms of established education facilities with 8 no. primary schools (including special needs) and 3 post primary schools."*
- *"it is submitted that the existing school infrastructure in the town is sufficient to cater for the proposed development."*

Regarding the **eight primary schools** quoted by the applicant (they just pulled this straight from the Celbridge Integrated Services Plan 2016-2020), there are only six mainstream schools as the eight included

- St. Raphael's Special School - attended by many pupils from outside Celbridge
- The Glebe Primary Montessori – this was a fee-paying private school that closed since publication of the Celbridge ISP 2016-2020 – some of the people involved in running the school subsequently opened Weston Primary Montessori in Leixlip.



We recently performed an audit of schools' capacity and enrolment numbers and found the following:

Primary Schools

- While there is some capacity in primary schools in the town, especially in Scoil na Mainistreach and Scoil Naomh Brid, the closest primary school to the proposed development at Crodaun (Scoil Mochua) is operating at capacity
- Scoil na Mainistreach and Scoil Naomh Brid are not within reasonable walking distance of the proposed development at Crodaun so **will result in unsustainable transport movements from the north of the town to the village and across the Shackleton Road for schools runs.**
- The Oldtown Woods development on the Shackleton Road (ABP-303295-18) is expected to require approximately 83 primary school places for its population and this will utilise a significant amount of Scoil na Mainistreach's capacity
- The recently completed Castlewellan Park development beside Aldi is expected to require approximately 26 primary school places for its population
- Scoil Naomh Brid is an all-girls school so will be unsuitable for boys from Crodaun

Secondary Schools

- Celbridge Community School will operate at full capacity from 2020-21 on completion of the extension to the temporary school and it will not be able to expand further – it awaits a permanent school south of the Liffey off the Dublin Road but this has been stalled for years due to “technical issues”
- The other two post-primary schools (Salesian College and St Wolstan's Community School) are operating at close to capacity
- The combination of Castlewellan Park, Oldtown Woods and the two proposed developments at Crodaun will require an additional 273 post-primary school places (109 of these would be required for the proposed housing development on the subject site at Crodaun) – **there is no capacity in the town for these students so development at this scale is premature**

Actions:

- Celbridge Community Council requests that the scale of this development be reduced to reflect the reality that there will be no post-primary school places for students until the delays in the provision of the Celbridge Education Campus off the Dublin Road are resolved.

2.5 Childcare Places

Members of Celbridge Community Council have first-hand experience of difficulties sourcing childcare. The following summarises Celbridge Community Council's understanding of the current childcare deficits in Celbridge.

- With the closure of four preschool facilities in Celbridge since June 2019 (one of these also provided Afterschool care), we estimate that there will be a shortfall of at least 60 ECCE preschool places in Celbridge for 2020-2021



- We estimate that the shortfall of Afterschool care places may be as high as 100-120 – availability of afterschool places was already an issue for parents but one of the childcare facilities that closed permanently in April 2020 catered for an estimated 40 afterschool children
- The shortfall in places for babies, wobblers and toddlers is difficult to gauge but the crèche with the highest capacity for babies is not taking babies until summer 2021
- See Appendix D for findings from recent research into childcare capacity carried out by Celbridge Community Council

In light of the shortage of childcare places in Celbridge and North Kildare, it is inevitable that families from outside the development will avail of large numbers of the proposed 89 places. This is especially the case given its attractive location for commuters (close to the M4 at the northern gateway to Celbridge). The applicant's assumption that residents of the development will be the primary users of the childcare facility is flawed and it would be prudent to plan for a larger facility to expand on a phased basis tracking demand for places as new families move into the development.

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. A facility catering for 120 children would be more appropriate for a development of this size.
- Celbridge Community Council suggests that the Universal Design Guidelines for future crèche/ childcare facilities be adhered to

2.6 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 – this no longer has capacity for new patients).

Actions:

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

3. Proposed Design

The design of the proposed development is of concern for many residents, in particular due to the height of the four large apartment blocks running parallel to the R405 from the junction with Kilwogan Lane northwards. At either 5 or 6 storeys high, the apartment blocks are not in keeping with existing housing in the vicinity so would undermine the existing residential character of the area and seriously impair the privacy enjoyed by current residents of both Crodaun Forest Park and Castlevillage. The multi-storey apartment blocks would also overshadow the bungalows in Crodaun Forest Park.

- Blocks C and D in the proposed development will have an overbearing visual impact and will cause visual intrusion into the existing Crodaun Forest Park bungalows closest to the R405 road.
- The residents of these bungalows will experience a significant negative impact due to overlooking and overshadowing of the large apartment blocks – especially blocks C and D.
- The Castlevillage estate will also experience a significant visual intrusion and will be overlooked by Block D in particular

3.1 Overshadowing

The planning application includes a Daylight Sunlight Report⁴ provided by O'Connor Sutton Cronin & Associates – Consulting Engineers. The evaluation of overshadowing on Crodaun houses in Section 8 of the report states *“The overshadowing images illustrate the overshadowing impact on March 21st at 10 a.m., 12 p.m., 2 p.m. and 4 p.m. The analysis confirms that overshadowing to the east properties would start being perceivable after 4 p.m., therefore it can be outline that negligible overshadowing impact will be perceived to any of the surrounding properties.”*

The Daylight Sunlight Report analysis only presents analysis for one date in the year (March 21st) and conveniently does not give any analysis after 4.00pm on that date. See **Appendix E** for a more thorough evaluation of overshadowing of the existing Crodaun Forest Park houses. This evaluation was carried out for Dec 21st, Mar 21st, Jun 21st and Sept 21st and clearly shows significant overshadowing of the existing Crodaun Forest Park houses. It should be noted that a number of these houses have solar panels.

3.2 Overlooking

The height of the proposed apartment Blocks C (16.8 metres) and D (21.3 meters) will result in overlooking which will be grossly intrusive on the privacy currently enjoyed by many Crodaun Forest Park residents.

Figure 3.1 is a representation of the view from the proposed Block C and clearly shows the extent of the expected overlooking.

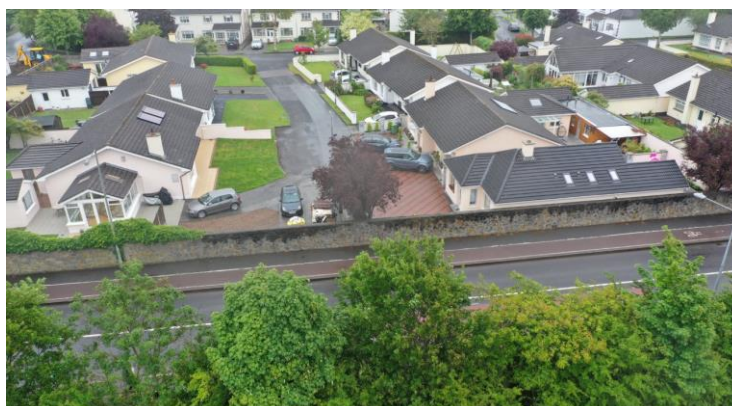


Fig. 3.1 Photo looking eastwards from the proposed location of Block D

⁴ <https://planningapplication.s3.eu-west-1.amazonaws.com/projects/1031/documents/B949-OCSC-XX-XX-RP-YS-0002-S4-P03.pdf>



3.3 Density

In addition to the overlooking and overshadowing concerns, the proposed design would deliver a density of 43.5 dwellings per hectare, which is 45% higher than the density planned for the site in the LAP. This is a material and significant contravention of the statutory document. The LAP and the planned densities therein were prepared with full cognizance of the local context, in terms of planning for development and population growth in light of apparent constraints including sustainable transport, physical and social infrastructure, as well as services and capacity in the highway network.

The applicant's Statement of Consistency attempts to justify the contravention of the density established in Celbridge LAP on the basis that the proposed development

"is of strategic importance in terms of securing appropriately designed compact residential development on zoned and serviced lands, being located immediately adjacent to a bus route (number 67 Dublin Bus) and helping to avoid further urban sprawl."

However

- the site has not been designated a Strategic Development Zone under either the Kildare CDP or Celbridge LAP
- the 67 bus service only runs twice per hour, is already overcapacity and is impeded by traffic congestion, so journey times on the bus are arduous
- the development would result in over 70% of future residents contributing to the already heavily congested M4 motorway while commuting to places of employment in Dublin and along the M4 corridor (reference Section 1.2 of this submission)

The applicant's argument is not convincing. Building at the proposed scale and density will not guarantee that this development is sustainable; it will just increase the number of cars on the road. When combined with the other developments in Celbridge and Leixlip, the volume of extra cars in the coming years will have a detrimental impact on the M4. While there are proposals to widen the M4 as far as Lucan, the N4 may be narrowing to a single lane at the M50 overpass to facilitate the BusConnects Lucan Core Bus Corridor so it does not make sense to build at this scale and density so close to a motorway junction.

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 do not 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 recommends that An Bord Pleanála refuses permission for development on this scale.



3.4 Traffic & Transport Design Issues

Celbridge Community Council's **Traffic & Transport Submission** (Appendix A) raises a number of points related to the design of the proposed development. Points 2.9, 2.10, 2.11, 2.13 and 2.14 from the **Traffic & Transport Submission** are all summarised in Section 1.1 of this submission and included in full in Appendix A.

4. Existing Problems with Utilities

Issues with electricity outages, water supply (pressure and outages due to burst pipes) and wastewater (smells and blockages) are prevalent in the Crodaun and wider Celbridge area. Infrastructure is simply substandard.

4.1 Electricity

The electricity supply to Crodaun and the surrounding area is already prone to outages. Residents fear that the infrastructure will not be able to cope with further demand without a significant upgrade to capacity first. Crodaun and surrounding area recently experienced a total outage for 48 hours.

4.2 Water Supply

Residents fear that the local water supply is at capacity. There have been a number of prolonged outages due to pipes bursting and taking days to repair.

4.3 Wastewater Network

The applicant proposes connecting this development to the existing wastewater network of Crodaun Forest Park, requiring an upgrade part way through the project. It is felt that the existing network is already at capacity and experiencing problems with waste treatment in the nearby Leixlip plant, particularly when heavy rainfall occurs. Connecting the proposed development into this network would totally overwhelm the network. The following comment that came as a response to a question in Celbridge Community Council's survey describes one of many issues that residents have faced due to issues in the wastewater network.

Sewage is an issue. There is one main line down the Maynooth Rd. Castletown estate floods regularly with heavy rain and my back garden was destroyed 7 times last year alone with sewage back up and overflow. I have lived here for 30 years and the issue happened three times previously. The issue was resolved and there were no problems for 15 years. It then happened twice in 2017, twice in 2018 and 7 times in 2019 (4 of these times were between September and November). I believe it is due to increased volume on the line and I wonder why rainwater is going in to the sewer anyway!

Question:

- In light of the issues experienced with the wastewater network, is it really OK to defer the upgrade to part way through the development? Should it not be a precondition before any development happens?



5. Environmental & Heritage Concerns

5.1 Bats

The applicant did not undertake a bat survey. Bat colonies in Castletown are protected and tall buildings in their flight line may endanger them.

A private citizen with considerable experience of bat surveying of more than 10 years echo located several bats using a bat detector on the night of 21st June 2020. Two distinct bat species were recorded (common Pipistrelles and Leisler) with the possibility of another two (one possible brown long-eared bat and one unknown as echolocation was too short in duration to identify it).

Action:

In light of the fact that two rarer species (brown long-eared and Natterer) are known to roost within a 1 - 2 km radius in Castletown demesne, Celbridge Community Council recommends that a thorough bat survey be carried out. This is essential so the correct consideration is given to any sort of lighting installed on the site (i.e. up-lighting or down lighting, colour of glass i.e. orange, yellow or white, and the LUX reading - for bats a low light level and low LUX reading is necessary).

5.2 Trees / Hedgerows

More hedgerows should be retained if permission is granted for the proposed development. The Bruton Consulting Engineers road safety audit supplied as part of the application recommended that *“any trees or roadside furniture within the visibility splays are removed or checked for momentary obstruction in combination with others”* and this was accepted by the applicant. There are already plans for extensive removal of hedgerows.

Question:

- Could hedgerows not be saved through a different design for entrances to the estate that would address other concerns raised by residents also?

5.3 Heritage Structures – Pillars

The pillar in this image is believed to be a gate pillar from Castletown Demesne dating from circa 1720. The applicant's **Statement of Consistency and Planning Report** states that there are no known constraints associated with the subject lands in respect of archaeology or built heritage and there is no evidence that the applicant has considered how to deal with this. CGI images of the proposed development do not show the pillar being incorporated into the design.



Question:

- Is there a risk that this may be within the visibility splays for the proposed access junctions onto the R405?
- Can this pillar be preserved?

5.4 Flooding at site of Griffinrath Landfill

The Griffinrath landfill behind the subject site for development has experienced extensive flooding rendering 60 acres of farmland unusable. The combination of low permeability soils and the shallow gradient of the land caused the waterlogging of the ground and the creation of a wetland. An estimated 120,000 tonnes of impermeable waste is pressing down on bog land at this location exacerbating the problem and lands beyond those of the landowner have flooded. There is concern that failure to address the landfill issue will result in the flood plain extending beyond its current size.

The flooding is visible in the background of this photomontage from the applicant's CGI pictures.



Drainage from the subject site will be into the Kilwhogan Stream which flows to this area. The applicant did not consider flooding impact on these wetlands in their application documents.

For more background on this issue, see An Bord Pleanála Case Numbers RL2169 and RL2665. An Bord Pleanála decided that the filling of lands at Griffinrath, Celbridge was not exempted development.

Action:

- That an assessment be conducted which assesses any additional flood risk to the lands surrounding Griffinrath landfill and any impact on pollution to the Kilwhogan Stream.



6. Conclusion

Celbridge Community Council requests that An Bord Pleanála refuses permission for development at the proposed scale. A decision to permit significant development at the subject site cannot be made until the site is supported by the infrastructure and services needed to be a truly sustainable development that does not negatively impact on the whole town (future residents of the proposed development and the existing residents of Celbridge)



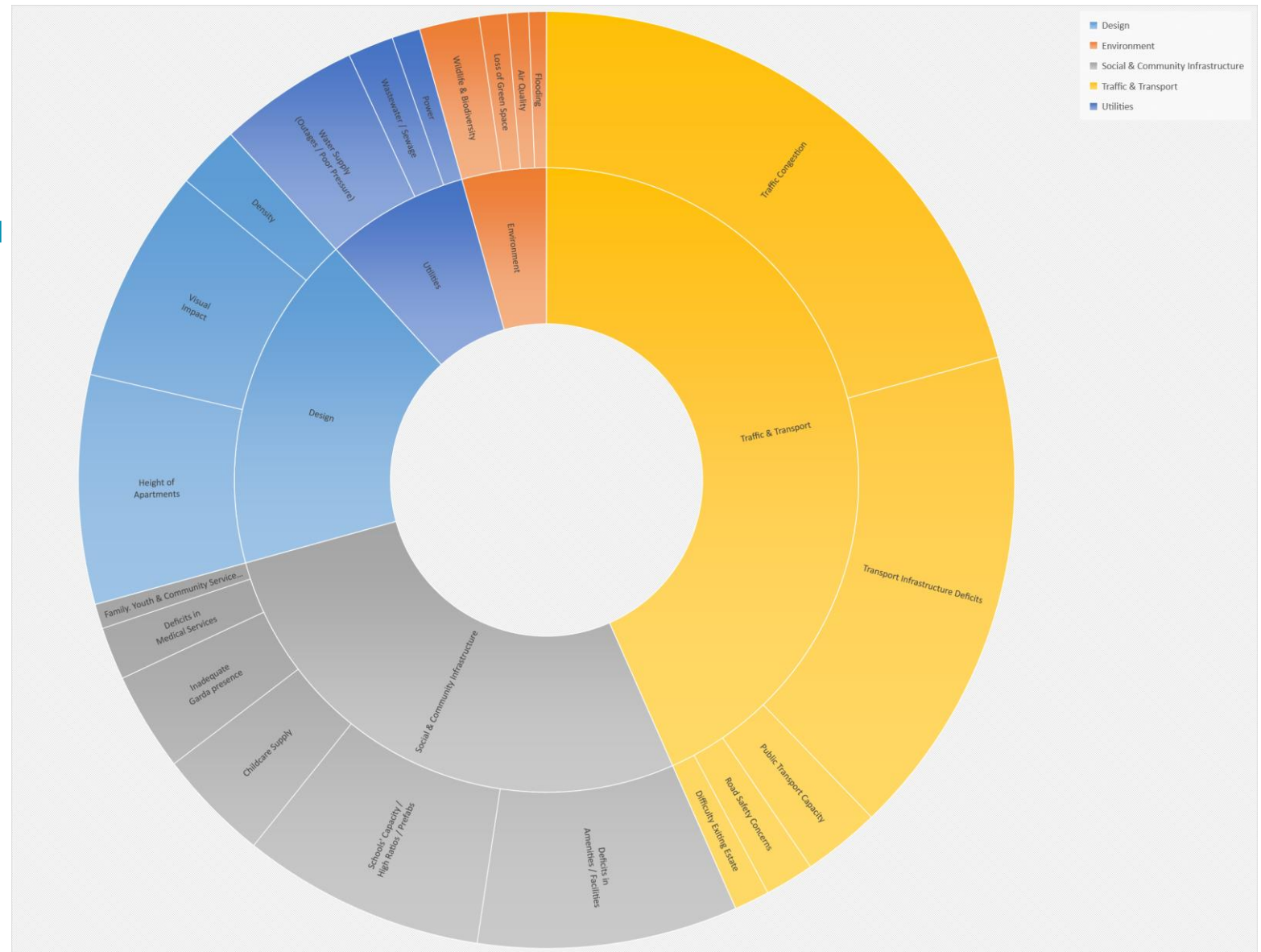
Appendices

Appendix A: Traffic & Transport Submission

Click [here](#) for this submission



Appendix B: Survey Findings - Concerns Regarding Impact of the Proposed Development





Appendix C: Survey Findings Regarding Social & Community Infrastructure

Chart C.1 - Residents' Rating of Provision of Community Infrastructure

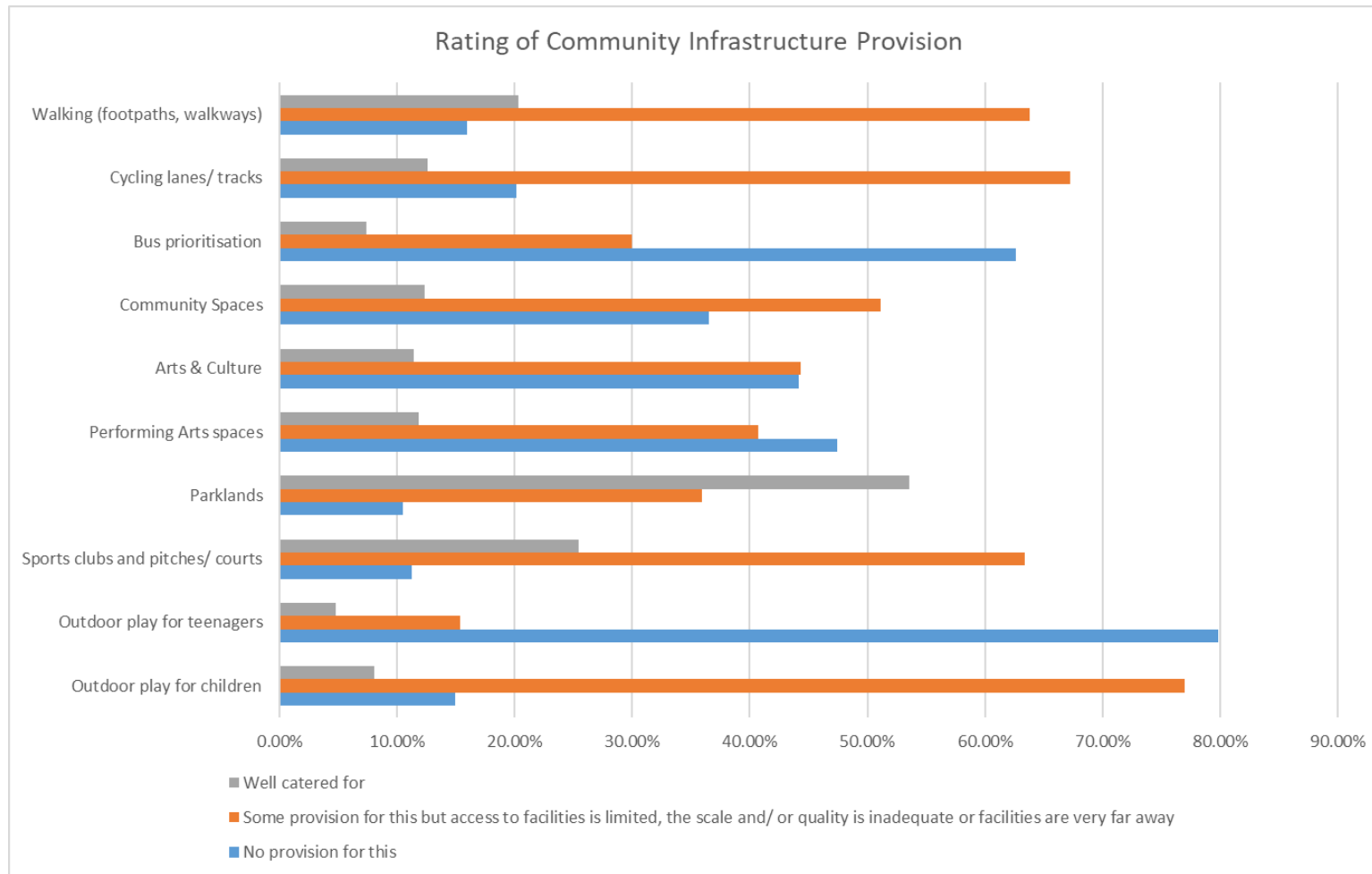
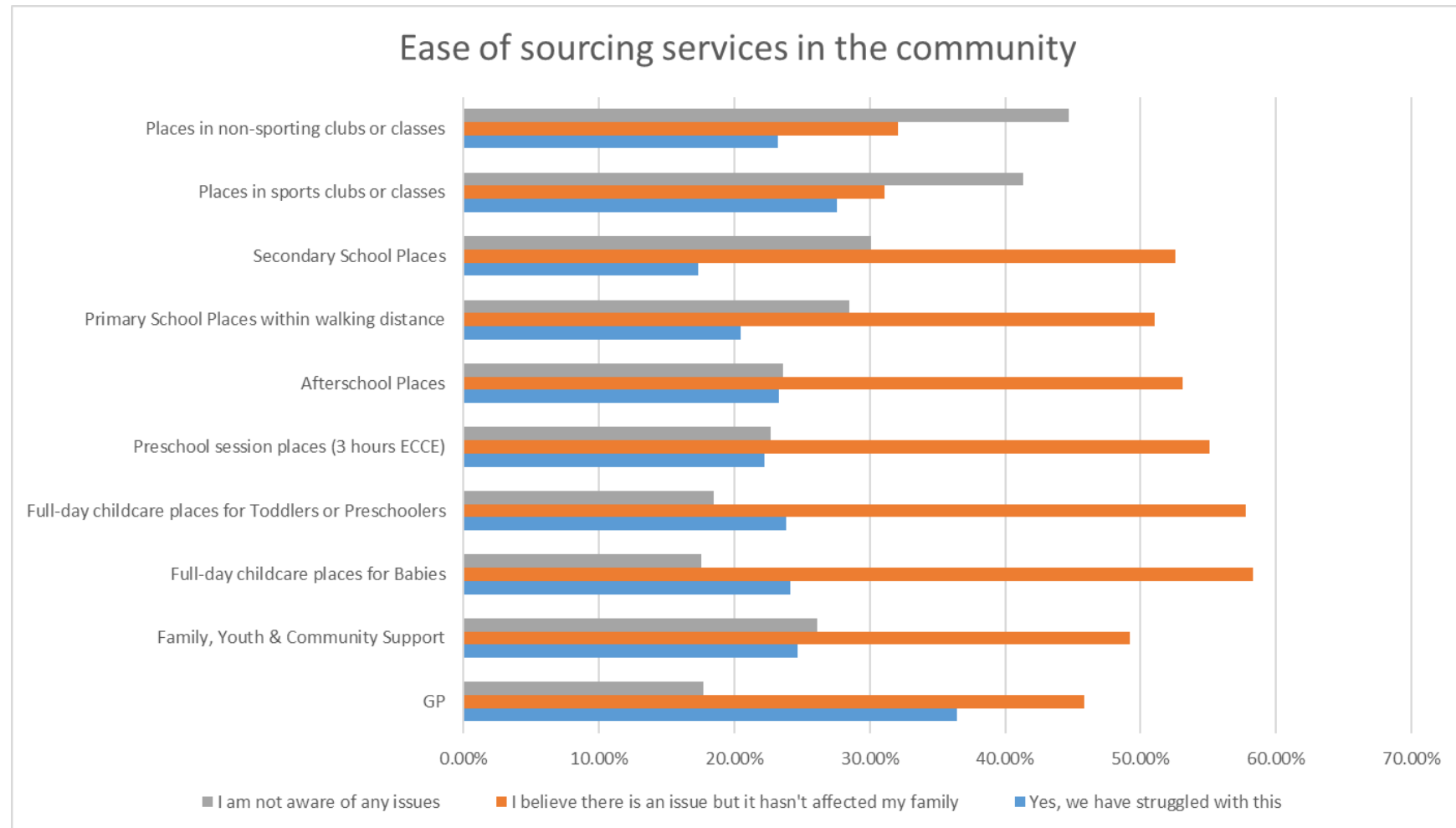


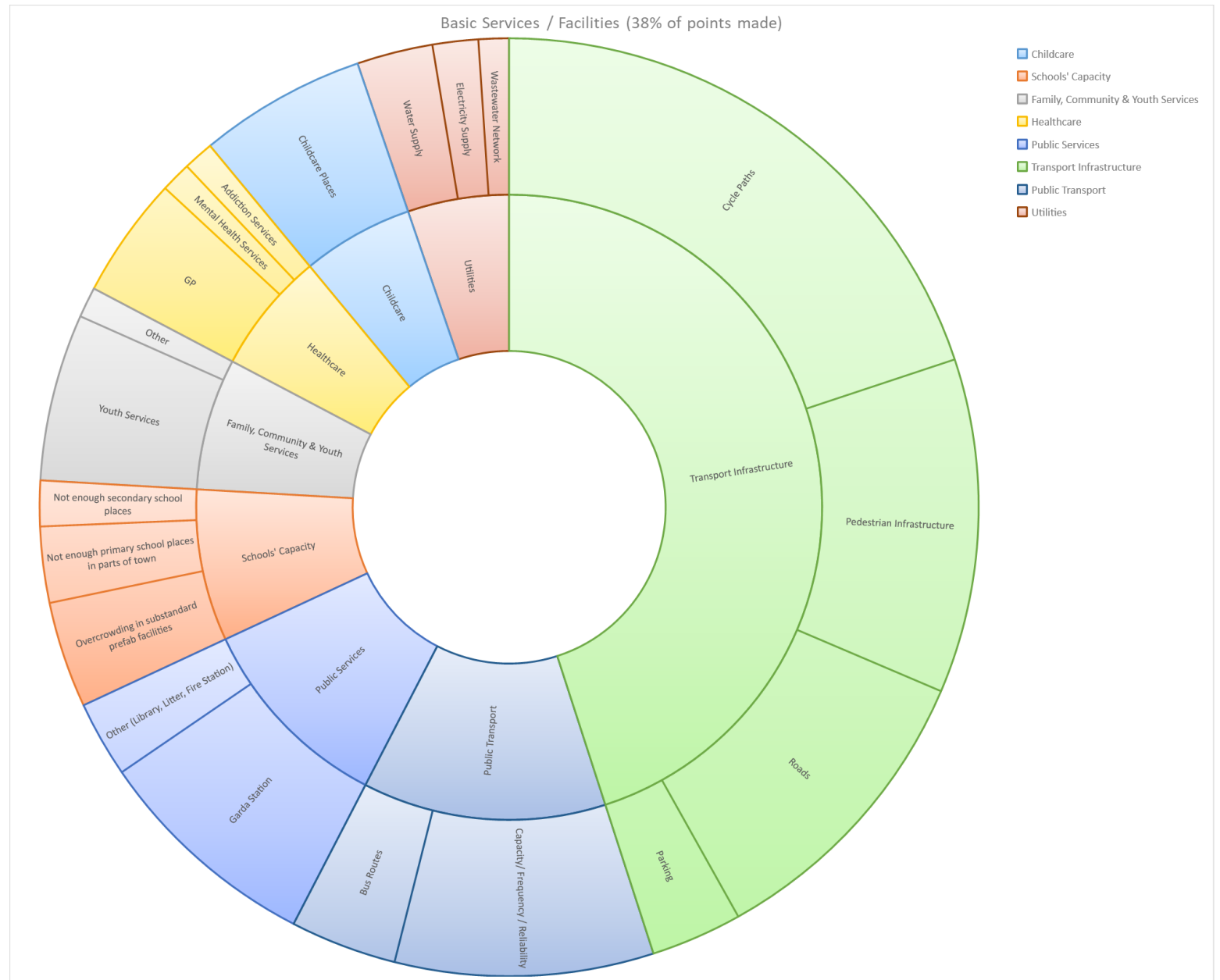


Chart C.2 - Ease/ difficulty with which Residents can source Community Services



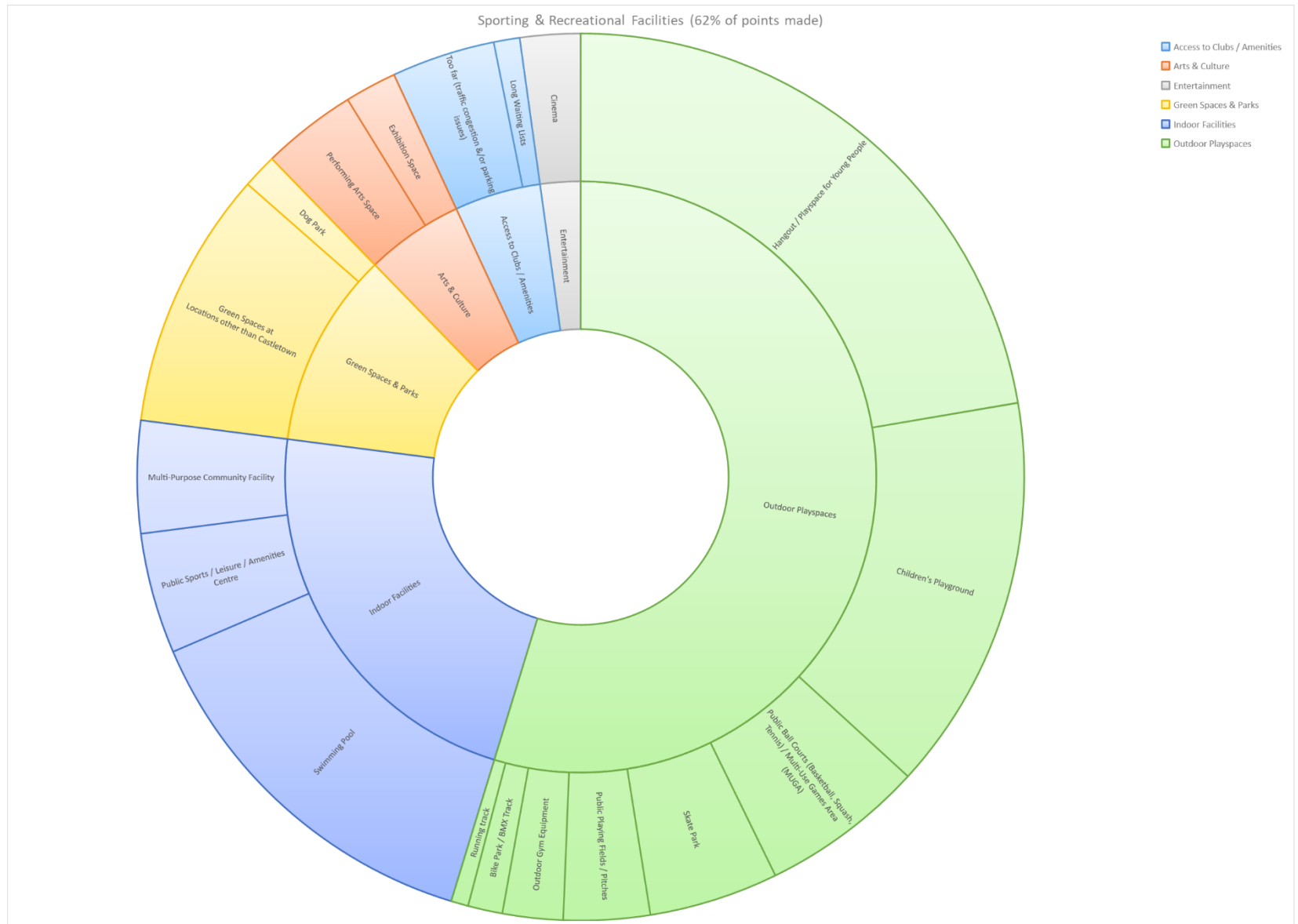


**Chart C.3 -
Analysis of
Open Question:
Deficits in Basic
Services / Facilities**





**Chart C.4-
Analysis of
Open Question:
Deficits in
Sporting &
Recreational
Facilities**





Appendix D: Findings Regarding Childcare Capacity

Supply

- Childcare services in Celbridge had a total capacity for **795** children in 2019-2020 according to numbers on Tusla inspection reports at <https://www.tusla.ie/services/preschool-services/creche-inspection-reports/>
 - **319** of these were ECCE places in sessional services.
 - The balance of **476** were a combination of ECCE places and baby, wobbler, toddler and afterschool places in facilities that offer a mix of childcare services
- **565** children were attending ECCE when the preschools closed in March
- Capacity of each sessional preschool service can be determined from the Tusla reports
- The number of **ECCE places** offered in facilities that offer a mix of childcare services cannot be determined from the Tusla reports
- The maximum number of children that can be accommodated by facilities that offer a mix of childcare services as determined from the Tusla reports is as follows (it is unclear whether these numbers represent the maximum number of children on **site at a time** in some cases):
 - **The Purple Penguin:** 73 children [this number may be higher] [6 babies in 2 baby rooms, 22 wobblers/toddlers in 2 rooms, 18 Sessional Montessori, 20 Full-day Montessori, 15 After-schoolers]
 - **Kiddies Choice:** 53 children [Capacity of 53 places including wobblers, toddlers, pre-schoolers and after-schoolers(maybe 15 places)]
 - **Giraffe:** 140 children [Capacity of 140 places including some fluidity in the numbers of babies accommodated (9-18 depending on whether there are 1 or 2 baby rooms) and the number of wobblers/toddlers/pre-schoolers as the children grow - the number of 140 may have included after schoolers but the afterschool service ceased in 2019 - they indicated to us 2-3 years ago that their capacity was 126]
 - **Cocoon:** 104 children [no babies accommodated - from 1-8 years only - includes wobblers, toddlers, pre-schoolers and after-schoolers up to age 8]
 - **Choice Childcare:** 60 of preschool age (was mixed sessional & part-time for wobblers, toddlers and pre-schoolers but may have switched recently to sessional only) + 15 after-schoolers
 - **Chatterboxes:** 46 children [includes babies, wobblers, toddlers, pre-schoolers and after-schoolers]
 - **Brilliant Beginnings (opening in September 2020):** 39 of preschool age (10, babies, 12 wobblers/toddlers, 17 sessional pre-schoolers) + 12 after-schoolers
- Assuming there were a handful of unfilled ECCE places in sessional services (while most preschools are full with waiting lists, this would reflect the reality whereby some services are less preferred by parents and some families moved away during the year), we will make the following assumptions
 - **310** ECCE places were provided through sessional services
 - **255** ECCE places were provided through facilities that offer a mix of childcare services
- 78 ECCE places have been lost through the closure of 2 separate services in April 2020 (50 in Happy Days, 28 in Tir na nOg)



- 17 of these ECCE places will be recouped through the opening of **Brilliant Beginnings** in September 2020
- An estimated 40 after-school places were lost with the closure of Happy Days in April 2020
- Going into 2020-2021, we estimate that there will be
 - **234** (310 - 76) ECCE preschool capacity at facilities that only offer sessional preschool
 - **272** (255 + 17) ECCE preschool capacity at facilities that offer a mix of childcare services
 - **270** non-ECCE spaces available at facilities that offer a mix of childcare services (542 minus the 272 ECCE spaces at these facilities)
- After-school capacity in Celbridge is provided by
 - Afterschool facilities that offer a mix of childcare services**
 - The Purple Penguin (collection from NKETNS & Scoil Mochua),
 - Kiddies Choice (collection from Scoil Naomh Brid)
 - Cocoon (collection from St. Patrick's National School only)
 - Choice Childcare (collection from Scoil Mochua only)
 - Chatterboxes
 - Brilliant Beginnings
 - Afterschool Clubs**
 - **Hopscotch** (based in NKETNS) - Up to **66** children many of whom are part-time so there are long waiting lists
 - **The Afterschoolers Club** (based in Scoil na Mainistreach) - Up to **17** children - this is full
 - **Shooting Stars** - Up to **35** children - only collects children from St. Patrick's in Celbridge and Maynooth Educate Together National School (METNS), where they used to be based - many places are taken by families from METNS and families are typically on the waiting list for over a year before places become available.



Demand

- The **2018-2019 Early Years Sector Profile** (<https://www.pobal.ie/app/uploads/2019/12/Annual-Early-Years-Sector-Profile-Report-AEYSPR-2018-19.pdf>) suggests that
 - 55.17% of children enrolled in childcare services are enrolled in ECCE,
 - 18.77% are babies or toddlers and
 - 26.06% are of school going age
- With a figure of 565 children attending ECCE when the preschools closed in March 2020, we can extrapolate that there might be a demand for 1024 childcare spaces in Celbridge made up of
 - 565 preschool spaces (55.17% of 1024)
 - 192 spaces for babies and toddlers (18.77% of 1024)
 - 267 spaces for afterschoolers (26.06% of 1024)

	Enrolled	Enrolled as a % of all enrolled
National (by ages)	177970	100.00%
Up to 1 (0-12 months)	2991	1.68%
1-2 years (13-24 months)	10895	6.12%
2-3 years (25-36 months)	19515	10.97%
3-4 years (37-48 Months)	49957	28.07%
4-5 years (49-60 months)	48234	27.10%
5-6 years (61-72 months)	16037	9.01%
6-8 years (73-96 months)	15315	8.61%
8+ years	15026	8.44%
National (by stages)	177970	100.00%
Babies & Toddlers 0-3	33401	18.77%
Preschool 4-5	98191	55.17%
Primary School 5+	46378	26.06%
Celbridge	1024	
Babies & Toddlers 0-3	192	18.77%
Preschool 3-5	565	55.17%
Primary School 5+	267	26.06%

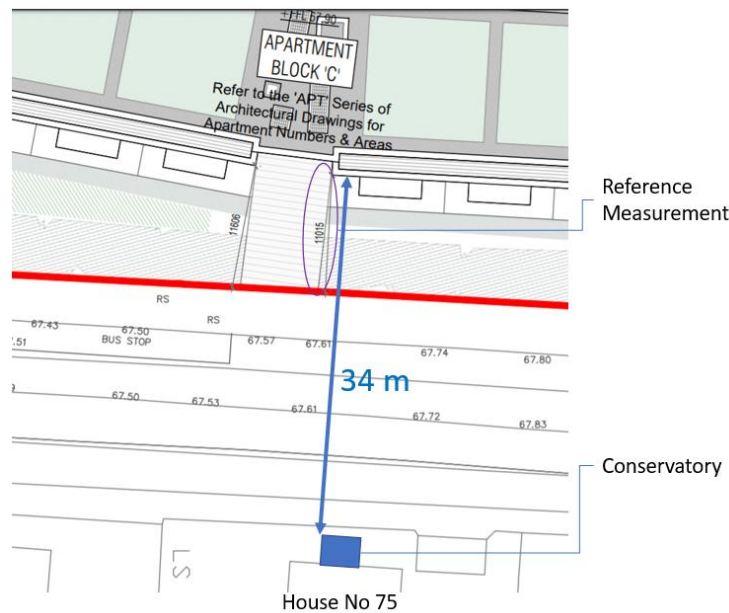


Gap between Supply and Demand

- With an expected supply of **506 ECCE places** (234 + 272), if demand matches the number of children enrolled in 2019-2020 (565) there would be a shortfall in the supply of ECCE places by 59
 - This figure does not consider additional demand from new residents in the newly constructed family homes at, for example, Castlewellan Park
 - Celbridge is down 111 ECCE spaces since June 2019
 - Two sessional services closed in June 2019 (Phil's School Around the Corner + Allsorts Childcare) with a loss of 52 ECCE places
 - Two more sessional services closed in April 2020 (Happy Days + Tir na nOg) with a loss of 76 ECCE places
 - Only one new provider is expected to come onstream in September offering 17 ECCE places
 - A number of families had to source ECCE preschool places outside of Celbridge after the June 2019 closures and many more will need to do so for September 2020 due to the two new closures - we expect that the demand is actually for more than 565 places
- Based on rough estimates for the supply of after-school places in Celbridge, we estimate that there may be a shortfall of over 60 after-school places and we have many community members who can verify that
 - there are no available after-school childcare places and
 - the waiting lists for after-school childcare places are so long that it is pointless putting childrens' names on them
 - An estimated 40 after-school places were lost with the closure of Happy Days in April 2020
- Based on rough estimates for the supply of places for babies, wobblers and toddlers (aged 0-3), if all places in Celbridge based facilities were filled with children from Celbridge, we estimate that there would be a shortfall of 10-15 places for 0-3 year olds **to meet the needs of the Celbridge population**, however
 - Giraffe has confirmed that it has no baby places available until summer 2021
 - Families from neighbouring towns who cannot source childcare for babies in their own town (Maynooth in particular) utilise Giraffe Childcare due to its proximity to the M4. This makes it even more difficult for families in Celbridge to source baby places and the shortfall is likely to be much greater than 10-15.

Appendix E: Analysis of Overshadowing of Crodaun Forest Park

The distance between the large multi-storey buildings (Blocks C and D) in the proposed SHD and the houses nearest the R405 was calculated from the site map and architectural drawings of the SHD⁵. This was done by taking a reference measurement from the drawing and comparing this to the distance from houses in Crodaun. An example of this is shown in Figure 1.



**Figure 1: Distance to house in Crodaun
(estimated by reference to measurements on Architectural Drawing)**

Figures 2 and 3 depict the shadow direction from the apartment blocks in the SHD in the direction of existing Crodaun Forest Park bungalows in the afternoon / evening.

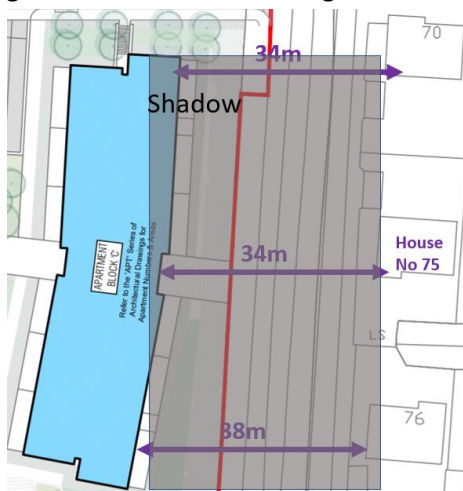


Fig 2. Distances of Crodaun Houses from Block C (Height 16.8m) and Shadow representation

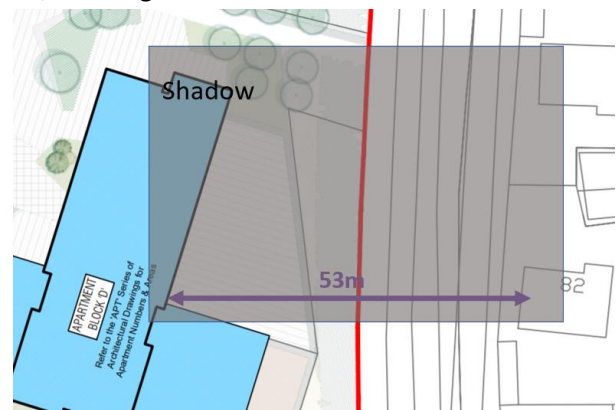


Fig 3. Distances of Crodaun Houses from Block D (Height 21.3m) and Shadow representation

⁵ <https://crodaunshd.ie/2-drawings/21-architectural-drawings>



In addition, the shadow length cast by both buildings in the direction of existing Crodaun houses was calculated⁶. These calculations are shown in Tables 1 and 2 for Block C and D respectively. The calculations were done for Mar 21st, Jun 21st Sep 21st and Dec 21st. The red highlighting shows the instances where the length of the shadow exceeds the distance between the apartment blocks and the existing Crodaun houses.

Block C						
Date	Time	Building Height (m)	Crodaun Address Initially Overshadowed	Distance from Apartments (m)	Length of shadow (m)	
21 March 2020	16:00	16.8	75 Crodaun	34	41.2	
	16:30	16.8	75 Crodaun	34	50.7	
21 June 2020	19:00	16.8	75 Crodaun	34	40.05	
	19:30	16.8	75 Crodaun	34	50.53	
	19:00	16.8	70 Crodaun	34	40.05	
	19:30	16.8	70 Crodaun	34	50.53	
	19:00	16.8	76 Crodaun	38	40.05	
	19:30	16.8	76 Crodaun	38	50.53	
21 September 2020	16:30	16.8	70 Crodaun	34	37.71	
	17:00	16.8	70 Crodaun	34	45.48	
	16:30	16.8	75 Crodaun	34	37.71	
	17:00	16.8	75 Crodaun	34	45.48	
	16:30	16.8	76 Crodaun	38	37.71	
	17:00	16.8	76 Crodaun	38	45.48	
21 December 2020	17:30	16.8	76 Crodaun	38	53.5	
	14:00	16.8	70 Crodaun	34	90.19	Orientation of shadow not in direction of Crodaun
	14:30	16.8	70 Crodaun	34	110.56	
	14:00	16.8	75 Crodaun	34	90.19	Orientation of shadow not in direction of Crodaun
	14:30	16.8	75 Crodaun	34	110.56	
	14:00	16.8	76 Crodaun	38	90.19	Orientation of shadow not in direction of Crodaun
	14:30	16.8	76 Crodaun	38	110.56	

Table 1: Calculation of shadow lengths from Block C

Block D					
Date	Time	Building Height (m)	Crodaun Address Initially Overshadowed	Distance from Apartments (m)	Length of shadow (m)
21 March 2020	16:00	21.3	81 Crodaun	45	51.71
	16:30	21.3	81 Crodaun	45	64.23
21 June 2020	18:00	21.3	82 Crodaun	53	35.05
	18:30	21.3	82 Crodaun	53	41.45
	19:00	21.3	82 Crodaun	53	50.78
	19:30	21.3	82 Crodaun	53	60.98
	18:00	21.3	81 Crodaun	45	35.05
	18:30	21.3	81 Crodaun	45	41.45
21 September 2020	19:00	21.3	81 Crodaun	45	50.78
	19:30	21.3	81 Crodaun	45	60.98
	16:30	21.3	81 Crodaun	45	47.82
	17:00	21.3	81 Crodaun	45	56.98
21 December 2020	17:30	21.3	81 Crodaun	45	73.3
	14:00	21.3	81 Crodaun	45	114.35
	14:00	21.3	76 Crodaun	55	114.35

Table 2: Calculation of shadow lengths from Block D

The calculations show that house numbers 70, 75, 76, 81 and 82 will be significantly impacted by overshadowing to varying degrees depending on the time of year. It is clear that the residents of these houses will experience a significant negative impact due to overlooking and overshadowing of the large apartment blocks. Blocks C and D in the proposed development will have an overbearing visual impact and a visual intrusion into these homes.

⁶ <https://www.suncalc.org/#/53.3541,-6.5476,3/2020.06.22/00:38/16.8/1>

It should also be noted that, while these bungalows will be the first houses to be impacted by overshadowing, other houses in Crodaun Forest Park which are further away from the R405 will also experience overshadowing at slightly later times.

Figure 4 illustrates in red the location of two structures that do not appear on the applicant's drawings:

- the sunroom extension to **75 Crodaun Forest Park** (planning reference **04/2011**) and
- a new house, **76A Crodaun Forest Park** (planning reference **14/747** and An Bord Pleanála Reference **PL.09.244112**)





Figure 5 is an aerial photograph of houses 75 and 76A and their relationship to the greenfield site on the left. Note that a number of houses in this area have solar panels the successful operation of which may be impacted by overshadowing.



Fig 5 Aerial View of Bungalows 75 and 76A