

Celbridge Community Council The Mill Celbridge Community Centre Celbridge Co. Kildare W23 P6P5

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Senior Executive Officer Planning Section Kildare County Council Áras Chill Dara Devoy Park Naas Co. Kildare

Submission Regarding a Material Contravention of the Celbridge Local Area Plan 2017-2023 (Planning Register Reference 24/60371)

To Whom it May Concern

Celbridge Community Council (CCC) was established as a voluntary community group in 1975 and has for fifty 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. For further details, please see <a href="http://celbridgecommunitycouncil.ie/">http://celbridgecommunitycouncil.ie/</a>.

As a voluntary group and a voice for the community, Celbridge Community Council wishes to make a submission on the public consultation in respect of the proposed <u>Material Contravention of the Celbridge Local Area Plan 2017-2023</u>, deriving from the planning application by O'Flynn Construction Co. Unlimited Company for a development at Oldtown, Celbridge Co. Kildare (ref 24/60371).

Celbridge Community Council generally supports the proposed development of a crèche and 61 residential units, even though it contravenes the Celbridge Local Area Plan, which designates the site for a new school. However, given the significant residential growth to the northern part of the town since 2017, CCC urges caution. Specifically, CCC believes that no further development should occur in the Oldtown area after this project, until the Celbridge Local Area Plan is first reviewed and updated.

Our analysis and conclusions are outlined below.

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### 1. Housing Context in Celbridge

Three critical documents that define the top-level numbers for planned housing units in Celbridge are Kildare County Council's <u>Celbridge Local Area Plan 2017-2023</u> and <u>Kildare County Development Plan 2023-2029</u>, and the Department of Housing, Local Government and Heritage's <u>Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities</u>. The Local Area Plan sets out the permitted areas for new housing builds, in the form of Key Development Areas (KDAs) and other infill sites. The County Development Plan refines the housing targets for each town to reflect the Regional Spatial and Economic Strategy (RSES), with Celbridge's target for 2023-2028 set to 914, on top of a target of 603 units for 2020-2022<sup>1</sup>. The Department's guidelines set the permitted housing density between 35 and 50 units per hectare, higher than the 30 units per hectare given in the Local Area Plan (LAP)<sup>2</sup>.

Even with the proposed additional 61 units for the Oldtown KDA, the resulting housing density in the KDA would be 34 units per hectare. While this figure is at the lower end of the current residential density guidelines, it is considered reasonable given that part of the site is allocated for a larger crèche. Moreover, in the broader context of the 1,491 housing units already granted planning permission in Celbridge since 2017, the proposed 61 units represent only a modest increase.

While the proposal may cause issues with local traffic flows, local drainage patterns, etc., this is not a sizable development in the overall context of Celbridge.

Table 1: Housing in Celbridge, planned and delivered, as per June 2025.

		Density	Number of Housing Units		
KDA or Infill	Area (ha)	2017 LAP	2017 LAP	Planning granted	Occupied
St Raphaels Town Centre	9	N/A	150	0	0
Ballyouster	29.5	30	885	0	0
Oldtown	13.7	30	411	399	251
Crodaun	19.9	30	600	839	372
Simmonstown	35	30	1050	0	0
Infill	14.1	30	423	253	154
Total	121.2		3519	1491	777

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<sup>&</sup>lt;sup>1</sup> Ref. **Table 3.3 Settlement Hierarchy – Population and Housing Unit Allocation 2020-2023** in the 2020 <u>Variation 1 to the Kildare County Development Plan 2017-2023</u>,

<sup>&</sup>lt;sup>2</sup> This explains why planning permission was granted for 839 units in the Crodaun KDA, significantly exceeding the LAP's provision of 600.



#### 2. Capacity Planning for Primary School Places

Table 2 shows an estimate of total enrolments in primary schools in Celbridge, taken from <a href="https://www.gov.ie/en/schools/">https://www.gov.ie/en/schools/</a>, and the available places in these schools, as reported in McCutcheon Halley's *Social Infrastructure Report For Development at Oldtown Celbridge on behalf of O'Flynn Construction*. The North Kildare Educate Together figure, missing in the report, was obtained by CCC directly from that school. All figures in Table 2 are for the academic year 2023/2024.

The calculated total available free places of 152 is misleading. We have not been able to confirm the number of 100 for Scoil Naomh Bríd for 2023/2024, but communications with the school indicate that this year's (2024/2025) spare capacity is much lower, at 7 mainstream places. This suggests that available capacity on the north-west side of the river Liffey in Celbridge, is likely to be much lower for 2024/2025, perhaps around 50. Most of this spare capacity is likely to be in the junior classes, with the more senior classes under much more pressure. Note that St Patrick's Primary School and Primrose Hill NS are on the south-east side of the Liffey.

Table 2: Primary school enrolments and capacity in Celbridge, for the academic year 2023/2024.

Primary School	2023/2024 Enrolments	Available spare capacity	Probable total capacity
Primrose Hill NS	119	16	135
Scoil Naomh Bríd	237	100	337
Scoil na Mainistreach	448	16	464
Aghards NS	660	0	660
North Kildare Educate Together			
NS	433	0	433
St. Raphael's Special School	96	20	116
St. Patrick's Primary School	401	?	401
Total	2394	152	2546

Going forward, one can expect that the new housing builds already granted planning permission will be of the order of 675 north-west of the Liffey. With an average household size of 2.75 persons and 11.5% of the population being of primary school age, the new builds with planning permission are likely to result in an extra demand of roughly 214 places, well in excess of available capacity in 2024/2025. This demand is likely to manifest itself in a relatively short time span of 2 to 5 years.

It is important to note that beyond the new housing already granted planning permission, very little of the subsequent housing stock expansion envisaged in the LAP is north-west of the Liffey. Future KDA housing, at least as given in the LAP, is to be primarily in the Simmonstown and Ballyouster KDAs, south-east of the river Liffey.

Further, longer-term trends in the population as a whole are suggestive of an aging population profile, with overall reduced demand for primary school places. Anecdotal evidence from local discussions with school

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principals would suggest that Celbridge's overall population is following similar trends. Therefore, in the medium term (5 to 10 years), it is unlikely that north-west of the Liffey will see additional pressure on mainstream primary school places.

#### Is the loss of a possible primary school site in Oldtown Woods a major issue?

A typical 2-stream school would deliver over 400 places, well in excess of near-term demand of 214. However, delivering this in the timelines needed to serve the new population seems unlikely. A quicker, feasible alternative would be to add an extra stream, for over 200 places, to one of the existing primary schools north-west of the Liffey. This is in line with the Department of Education's stated position for Celbridge, as per the Department of Education's submission on the Draft Kildare County Development Plan 2023-2029: "The level of potential increase in school place requirements arising from the increased population... can be met by existing facilities (or a minor expansion thereof if required)."

Thus, the loss of the LAP primary school site, as per O'Flynn's proposal, is not the major issue it may first seem

Note that our analysis also completely ignores and discounts the offer of a replacement site by O'Flynn, for reasons outlined in Section 4 below.

## 3. Capacity Planning for Childcare Places

Table 3 shows for north-west of the Liffey in Celbridge, the list of childcare service provides registered with Tusla in March 2025, taken from <a href="https://www.tusla.ie/services/preschool-services/early-years-providers/register-of-early-years-services-by-county/">https://www.tusla.ie/services/preschool-services/early-years-providers/register-of-early-years-services-by-county/</a>. The 2022 CSO Census <a href="reports">reports</a> that there were 953 children between the ages of 0 and 4 years in the same area. So, there is roughly 1 place for every 2 children in the area. State-sponsored places in the Early Childhood Care and Education Scheme (ECCE) make up a significant portion of the available places. Therefore, it is safe to assume that pre-ECCE creche places for younger children (typically less than three years old, with more stringent staffing ratios) are running at a much lower level of provision.

Table 3: Childcare service providers north-east of the Liffey in Celbridge, March 2025.

Childcare Facility	Location	Places
Celbridge Montessori School	The Slip Hall	23
Choice Childcare	Thornhill	60
Cookies' Early Learning Centre	Ardrath	51
Giraffe Childcare	M4 Business Park	140
Happy Years Childcare	Oldtown Mill	50
Kiddies Choice Creche	Maynooth Road	51
Memory Lane Playschool	The Mill	22
Naíonra Aoibhneas	The Mill	18
The Children' s Circle	Thornhill Heights	22

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The Purple Penguin Creche & Montessori	Oldtown Mill	73
Vivienne's Playschool	Abbey Farm	13
Total		523

CCC reached out to the 11 listed service providers and made contact with 7. Only three of these reported any spare capacity for September 2025 – nine places in total and only two for non-ECCE children. It is clear that non-ECCE childcare provision remains under severe stress in this part of Celbridge with the current population.

#### A new full-time childcare facility is a definite near-term need for the area.

It is worth noting that the additional builds with planning permission, for north-west of the Liffey, in theory should not exacerbate the situation since the two major ongoing builds are expected to include childcare facilities: 41 places in Grattan Park (Oldtown) and 89 places in Kilwoghan Woods (Crodaun). However, the situation needs further monitoring: the size of the Grattan Park facility may be too small (see below) and the creche in Kilwoghan Woods is in part of the site that is to be amended and will require new planning permission.

McCutcheon Halley reports that the existing 62-place facility in Oldtown Woods remains unused since the size is below the level needed for viability, at least as per the feedback O'Flynn received from commercial providers. The proposed new build for 115 places would be the second largest in the area and the third largest in Celbridge overall (after Giraffe Childcare and Cocoon Childcare in Hazelhatch).

## 4. The Broader Planning Context

The *Celbridge Local Area Plan 2017-2023 (LAP)* was intended to guide development in Celbridge only up to 2023. While it remains legally in force, we are now two years beyond its planning horizon, and key elements of the LAP are no longer aligned with the more recent Kildare County Development Plan 2023–2029, particularly in terms of consistency with the Regional Spatial and Economic Strategy (RSES).

It is essential to closely monitor and manage housing growth to remain within the 2020–2028 target of 1,517 units for Celbridge. This is necessary to ensure that the pace of development is balanced with the 'catch-up' investment required in infrastructure, services, and employment opportunities—critical components in supporting Celbridge's designation as a Self-Sustaining Town. In particular, the question of class sizes needs to be addressed. Many schools in Celbridge are operating with much higher class sizes than the general average of 23 quoted in January 2025 by the Minister for Education. The Department of Education would need to reexamine the long-term capacity of schools in Celbridge to meet the stated government target of reducing class sizes to 19.

An updated Local Area Plan is not expected before 2027 at the earliest —twelve years after preparatory work for the current plan began in 2015. In the meantime, development within the Oldtown area has progressed

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Charitable Tay (CHY) Examples: 6



in a fragmented way, involving four separate developers across four sites: two within the boundaries of the Oldtown Key Development Area (KDA) and two infill developments within the Oldtown Mill estate.

Given this fragmented approach and unclear planning context, we are wary of proposals to relocate the planned primary school to an alternative site currently zoned for agricultural use: we are concerned that there will be further associated housing proposals that would constitute material contraventions to the LAP on adjacent agricultural land, continuing the trend of piecemeal development without a cohesive long-term vision.

CCC strongly recommends that no further development be considered in the Oldtown area beyond the current proposal (Reference 24/60371) until a comprehensive, evidence-based plan is prepared. This plan should be informed by independent assessments and audits and should either be a standalone masterplan for the area or be incorporated into the forthcoming updated Local Area Plan.

# 5. Celbridge Community Council's Position Regarding This Planning Application

Superficially, this planning application sets up a choice between (i) a primary school and (ii) a childcare facility with 61 housing units (plus an option for an alternate primary school site). However, as discussed above, the most likely scenario is that the Department of Education may accommodate any excess demand for primary school places by expanding one of the existing primary schools in the area. Therefore, the real choice is likely to be between

(a) a field remaining under agricultural use

and

(b) a childcare facility plus 61 housing units.

Assuming O'Flynn is correct in their assessment that the existing Oldtown Woods building for a childcare facility will remain unused due to issues around viability, then their proposal that includes a new, larger facility, i.e. option (b) above, is to be welcomed.

Yours faithfully

Laura Sloyan

Secretary, Celbridge Community Council

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