



Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government



03 February, 2017

Draft Celbridge Local Area Plan 2017-2023,
C/O Senior Executive Officer,
Planning Section,
Kildare County Council,
Áras Chill Dara,
Naas,
Co. Kildare.

Re: Draft Celbridge Local Area Plan 2017-2023

A Chara,

I am directed by the Minister for Housing, Planning, Community and Local Government to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department notes the contents and broad approach of the Draft Celbridge Local Area Plan (LAP) 2017-23, which provides a framework for the future growth of this fast growing town over the next six-year period. The Department furthermore considers that, while many aspects of the plan constitute a reasonable and well considered framework for future development, there are also significant aspects of the draft plan requiring amendment to meet statutory and legislative obligations.

Proposed Residential Development

In overall terms, the Department considers that the development strategy for Celbridge should focus less growth to the north of the town, where additional housing development is most likely to add to additional car based commuting feeding into the already congested M4 and regional road network and more growth to the south of the town where there is a high degree of public transport accessibility.

As your authority will be aware, Hazelhatch, to the south east of Celbridge on the R405 road is located on the Kildare Route rail investment project (€400m+ investment) and further enhancement including electrification of the line is planned.

The focusing of new development at locations proximate to high quality public transport in the interest of a sustainable pattern of urban development is a well-established planning policy principle most recently confirmed in the National Planning Policy Statement, 2015 (Principle No. 5). The prioritization of public transport corridors/accessible locations for new development is also clearly identified in several National Planning Guidelines under s.28 of the P & D Act 2000 (as amended) including the Development Plans Guidelines 2007 (s.4.12), Local Area Plans Guidelines 2013 (s.5.6) and the Sustainable Residential Development in Urban Areas Guidelines 2009 (Chapter 5). The Government's *Smarter Travel: A Sustainable Transport Future* (2009) policy also reiterates the need for integration of transport and land use planning (Chapter 4) with a general requirement that significant housing development in all cities and towns must have good public transport connections.

Notwithstanding this substantial public investment in public transport services in Celbridge and the various national, regional and county level planning policies requiring prioritisation of the location of new development proximate to public transport corridors, the Draft Celbridge LAP has not appropriately responded to this strategic policy context by focusing the allocated future development potential and growth identified for the town in the Kildare County Development Plan Core Strategy in public transport accessible locations such as in the vicinity of the train station at Hazelhatch.

Instead, what scope there is to provide additional zoned lands for housing working within the County Development Plan core strategy has instead been identified for lands on the western and northern periphery of the town – KDA 4 (1425 homes) and KDA 5 (450 homes), some 3.5-4.5 km by road from the train station.

While it is noted the Strategic Flood Risk Assessment that accompanies the LAP indicates that certain lands in the vicinity of the train station are not appropriate for zoning for residential development, such lands at flood risk are limited in extent, generally being to the immediate north west of the station. Instead, there remains substantial undeveloped lands that are strategically positioned between the existing built form of the town and the train station at Hazelhatch - both to the east of the R405 road and also at Simmonstown Stud (east of KDA No.6).

Given the preference for public transport served locations in an array of stated Government policy (*Smarter Travel*) and Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), for example in relation to sustainable residential development in urban areas, the Department is of the view that the draft LAP is not consistent

with such a policy approach because it is preferring locations more dependent on car based transport solutions than locations with high capacity for public transport provision.

In the circumstances, the Department requests your authority to switch the identification of future residential development lands from the north side of Celbridge to the south side of Celbridge to capitalise on the extent of existing public transport infrastructure, but at all times ensuring that the amount of development identified for the town in the local area plan accords with the core strategy requirements of the Act.

Planned Supporting Infrastructure

Section 4.4 of the LAP states that '*the capacity of the water supply and wastewater network will be a critical determinant for significant new development in Celbridge*'. Chapter 9 of the LAP notes that the Leixlip wastewater treatment plant is being upgraded and that Irish Water is preparing catchment plans to identify infrastructure needed for improved drainage capacity in the Lower Liffey Valley catchment. Section 9.1.2 also recognises that there are existing constraints within the local network of Celbridge which need to be addressed in order to support development.

The LAP however does not provide an analysis of constraints of the local drainage network in Celbridge or commentary on the planned/required infrastructure to serve their substantial new development areas around the town. There is significant housing development proposed in the LAP and it is necessary for the availability of waste supply and water services to inform the zoning of lands for housing which are intended to be developed over the plan period.

In addition, sections 4.4 and 8.3 of the LAP also reference the significant problem of traffic congestion in the town and the absence of a second crossing of the River Liffey as a significant constraint to new development. The zoning of lands at Oldtown for 1400+ new homes is also accompanied by the proposal for an extensive new western ring road/by-pass on the western side of the town joining the R403 and the Maynooth Road north of the town. This is a significant new infrastructural proposal that does not appear to have been integrated into an overall transport strategy at a network/town level.

An additional road crossing of the River Liffey is therefore identified as a strategic transport infrastructure for the town (as per Table 6.1 of the Draft Kildare CDP 2017-23) but appears not to have been provided for in the overall phasing of new housing development. Section 13.5 of the LAP - *Phasing* provides for the development of particular infrastructural requirements that are to be delivered to support new housing development in each of the 6 KDA's. However, particular road and bridge infrastructural elements that are strategic to the overall functioning of

the town have not be phased/linked to new development overall. Instead there appears to be a piecemeal and disjointed approach to the delivery of identified strategic road infrastructure.

The LAP overall does not provide for a comprehensive phasing programme for the delivery of the significant infrastructure required to support the substantial housing development proposed. Such an approach is contrary to the Local Area Plans Guidelines (2013) which emphasizes the critical need to identify delivery and funding mechanisms where significant new infrastructural development is proposed in an LAP.

North Kildare Employment Lands Strategy

The Draft LAP features limited commercial/business zoning – primarily the zoned lands adjoining to the M7 and Maynooth Road north of the town for light industry and warehousing. In the wider context however, the Draft Kildare CDP 2017-23 includes proposed Objective EO16:

‘To carry out a strategic assessment of employment lands in the County to inform the Regional Spatial and Economic Strategy, and in particular to assess the need for new employment sites in the economic growth centres of County Kildare’

This study is significant from the perspective of the acknowledged shortfall in zoned employment lands in Celbridge (section 5.3.2 of the Draft Kildare CDP 2017-23). It is important that the Draft LAP is coordinated with this wider study on employment lands in order to ensure that Celbridge develops strategically as part of the metropolitan area of County Kildare.

Summary

The Council is therefore requested to address the issues highlighted above in the Material Alterations stage of the statutory LAP process. The Council is advised to specifically:

- a) Provide for the relocation of appropriate zoning of housing lands on the south eastern environs of the town in the vicinity of Hazelhatch Train Station;
- b) Delete proposed residential zonings on the western periphery of Celbridge;
- c) Provide an IMPLEMENTATION AND INFRASTRUCTURE DELIVERY SCHEDULE in the LAP (per chapter 6 of the Local Area Plan Guidelines 2013) which ensures that new development is clearly phased on the basis of the timely delivery of identified new strategic infrastructure for the overall town including in particular:

- (i) Strategic road network and bridge infrastructure over the River Liffey that addresses the acknowledged congestion problem in the town and the additional traffic generated from new development
- (ii) Required water supply and waste water network infrastructure that can service the new residential zonings of the LAP
- d) Review the availability of additional employment/ business lands in the LAP to ensure that Celbridge develops strategically as part of the metropolitan area of County Kildare and coordinates with the examination of employment lands under Objective EO16 the Draft Kildare CDP 2017-23.

The Council is also reminded that the Draft Celbridge LAP 2017-23 should be carefully considered in the subsequent stages of the LAP process to ensure that it is consistent with the adopted Kildare CDP 2017-23 (anticipated to be adopted in February 2017).

The planning authority is also reminded to have regard to any observations made by the Office of Public Works, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, National Parks & Wildlife Service, Environmental Protection Agency and Irish Water. In this regard, Kildare County Council must satisfy itself that it has met the relevant requirements as appropriate, and that the Draft Celbridge LAP 2017-23 is fully compliant with its obligations under planning legislation.

The officials of the Department are available to discuss the matters raised above and in the first instance you are advised to contact Mr. Stewart Logan, Planning Adviser on 01-8882419.

Is mise le meas,



Niall Cussen
Principal Adviser
Forward Planning Section