

AN BORD PLEANÁLA
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An Bord Pleanála,
Marlboro Street,
Dublin 1.
18th July 2022.

Submission re: Strategic Housing Development 22313825 Donaghcumper Celbridge.

The application is being made by Kieran Curtin, Receiver over certain assets of Maplewood Development Unlimited Co.

The Regional Planning Guidelines 2010-2022 set the direction of growth for the Dublin and Mid East Region. Celbridge was designated as a "Moderate Sustainable Growth Town". The two neighbouring towns of Maynooth and Leixlip was designated as a Large Growth Town's with both deemed capable of accommodating significant new residential development. The Kildare County Development Plan 2017-2023 provided for an additional 10,000 population to each of the three towns despite the differing designation's.

In addition to the existing housing stock there are currently several large sites where new housing is under construction in Celbridge. Some of this development was approved under the SHD process. It is essential to consider the cumulative growth rather than individual sites in assessing the capacity of the town to absorb further development, in the absence of some critical infrastructure and services being put in place. This includes school facilities which are currently severely stretched.

It is important to examine some of the reasons why this is the case. In 2009 and 2010 the Department of Education approved the purchase of two sites totalling 10 acres. In 2009 Kildare County Council granted two outline planning approval's for a primary and a secondary school. In 2013 planning reference 13/818 Kildare County Council refused planning permission, this decision was upheld by An Bord Pleanála. There were a number of grounds given for the refusal the following was the first reason.

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- 1. The development site is an area of series of historic flooding. It is proposed to construct the development at levels 1.2 metres to 1.7 metres above existing ground levels. The displaced flood waters generated as a result of alterations to existing ground levels, the reduction of flood plain attenuation and the reduction of flood flow routes presents an unacceptable risk to people and their property, would be prejudicial to public health and safety, would seriously injure the amenities, or depreciate the value, of property in the vicinity, and would therefore be contrary to the proper planning and sustainable development of the area.*

In a letter included with the current SHD application, The Department of Education state they are aware of this application for new residential. They further state that the proposed site for a 3 school campus of 7.2ha is sufficient to meet future needs. It is stated by them that it is currently projected that a planning application for school campus development will be lodged within the timeframe of circa 12 to 18months.

The three school campus is intended to provide permanent accommodation for St Patricks Primary School, this school has been in temporary accommodation since it was opened and currently has just short of 400 pupils. Celbridge Community School is a second level school with 542 pupils, it has expanded on its current location to the point where further expansions are not possible, and 2023 has been identified as a real pinch point where intake will have to be restricted. The third school is St Raphael's special school who cater for children with intellictural and physical disabilities, the facilities are very substandard and intake has had to be restricted. Kildare currently has the largest class sizes in the country, (INTO is the source) and Celbridge is certainly no exception to that.

Given the previous experience where school sites were acquired but failed to get planning permission and the exceptionally long time it has taken to identify and acquire a replacement. It is completely understandable for the community to want some certainty in terms of school places in advance or at least in tandem with new housing developments, particularly given just how stretched the existing schools have become. The expectation in Celbridge was that on the current site, both housing and the three schools would be applied for under the same application, the time lag for the provision of new schools is therefore not acceptable.

Flood Risk

The current application addresses the issue of flood risk, this risk is being considered on just the portion of the site where housing is being applied for rather than the totality of the site. Given the previous experience it is essential that the flood risk is considered in the context of the whole site which will impact on the ability of the land to absorb excess water.

Should for example a flood assessment fail on the school site following the construction of an additional 344 new housing units, then a chronic shortage of school accommodation would become a real crisis.

Department of Education

The Department of Education in purchasing the previous site where planning permission was not subsequently granted are now currently projecting that a planning application will be lodged in 12 to 18 months. Presuming such an application is approved which would optimistically take perhaps 6 months. The Tender process would then perhaps take a further year before construction is commenced. It can unfortunately be predicted, even if everything goes according to plan, that there is a looming school place crisis in Celbridge.

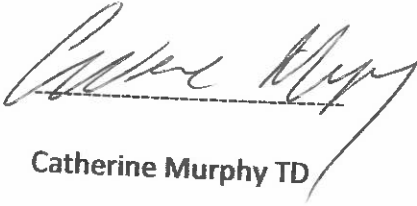
Community Facilities/Infrastructure.

According to the 2016 Census of population Celbridge had a population of 20288 this made the town the largest of the three North Kildare Towns. The 2022 census will see those numbers grow considerably. In addition to the pressure the existing schools are under, infrastructure has severely lagged behind and traffic congestion is a real problem. This is an issue constantly raised when further housing developments are approved and commenced. It is not that there is any objection to new housing in itself, but there is an objection to the lack of other infrastructure, facilities and services the should accompany it.

There is a large young population in Celbridge but despite increases in population nothing has been added to provide leisure facilities, neighbouring towns are now accommodating players from Celbridge who cannot be included in local teams for capacity reasons. There is for example no public swimming pool in North Kildare where the population exceeds that of Waterford City. There is no full time Garda Station in Celbridge and Kildare has the second lowest ratio of Gardai to population nationally. Another example of a basic facility that is absent is that there is no recycling centre in North Kildare. All of this adds to the pressure to travel for basic services, it also adds to the costs for those living in the town and for those who will purchase the new housing currently under construction.

The designation of Celbridge as a "Moderate Sustainable Growth Town" as opposed to a "Large Growth Town" is recognition of the shortcomings in capacity of Celbridge to absorb large scale development, yet, the town is expanding without those shortcomings being addressed in the first instance.

Finally, it is critically important that there is certainty about school capacity, at the very least this application should have considered both in tandem. Given the previous experience with the school site it is essential that the flood risk is considered in tandem with this application.

A handwritten signature in cursive script, appearing to read "Catherine Murphy", is written over a horizontal dashed line. The signature is fluid and extends slightly to the right of the line.

Catherine Murphy TD

