

An Bord Pleanála

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Dublin 1,

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From Cllr Nuala Killeen

21 Abbey Lane

Abbey Farm

Celbridge, Co. Kildare

20th July 2022

Ref: Observation in respect of SHD application 313825: Lands at Dublin Road and the Shinkeen Road, within the townlands of Donaghcumper and Ballyoulster, Celbridge, Co. Kildare. (www.ballyoulstershd.ie)

Description: 7 year permission for 344 no. residential units (130 no. houses, 214 no. apartments), creche and associated site works.

Observation in respect of the proposed SHD

In respect of the above application for 7 year permission for 344 no. residential units, I would like to state initially that housing of good standard is welcome in the environs of Celbridge.

The area designated for development was outlined in Celbridge Local Area Plan 2017 – 2023 KDA2 Ballyoulster.

[Draft Celbridge Local Area Plan 2017-2023 \(kildarecoco.ie\)](http://kildarecoco.ie)

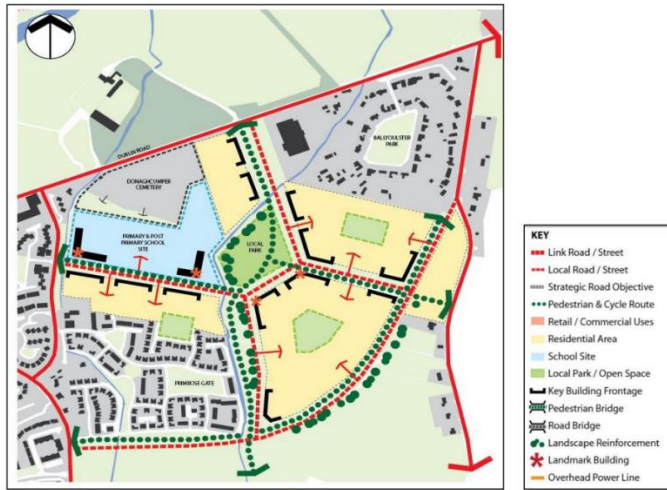


Figure 12.1 Design Concept for KDA 2 Ballyoulster

From the Celbridge Local Area Plan:

Within Celbridge LAP, designated under the hierarchy as a Self-Sustaining Town.

The Regional Planning Guidelines 2010-2022 set the direction of growth for the Dublin and Mid East Region.

As part of this designation, Celbridge was designated as a “Moderate Sustainable Growth Town”.

Kildare County Development Plan 2017-2023 provided for an additional 10,000 population to each of the three North Kildare Towns Leixlip, Maynooth & Celbridge, despite the differing designation’s.

It is anticipated that Celbridge would absorb 10% of the County’s population growth with the growth of Maynooth & Leixlip expected to achieve just over 10% growth despite being higher on the settlement hierarchy.

Following initial census results it has become clear that Kildare has exceeded the 10% growth projections:-

Co Kildare was one of the counties that saw large growth at 11% or 24,473 people. In 2016, the Census recorded a population of 222,504. In 2022, it recorded a population of 246,977.

[Components of Population Change - CSO - Central Statistics Office](#)

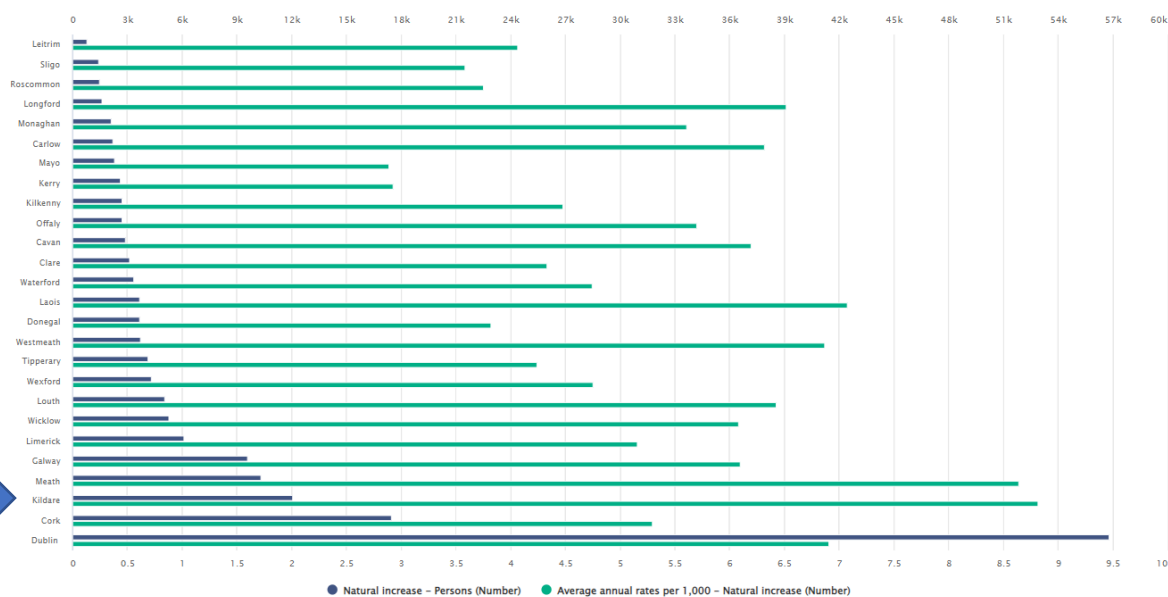
Natural increase by county

Kildare and Meath had the highest average annual natural increase gaining 9 persons per 1,000 of population per year between 2016 and 2022. This was followed by Laois, Dublin, Westmeath and Longford with an average natural increase of 7 persons per 1,000 of population per year.

In Dublin, Fingal had the highest natural increase with 11 persons per 1,000 of population. This was followed by South Dublin with an average annual natural increase of 9 persons per 1,000 of population.

Mayo and Kerry had the lowest average annual natural increase, both gaining 3 persons per 1,000 of population. The data on the natural increase is illustrated in Figure 3.3 below.

Figure 3.3 – Average annual natural increase by county, 2016–2022



Proposed three school Education Campus:

There is much disappointment within the community that the strategic school campus as identified in the above was not realised at the same time. A letter from Dept of Education indicates that an application for the schools campus will be sent in within 18 months of the application date of the SHD application - 16th June 2022 .

The schools should be delivered at a higher priority. Negotiation in respect of the campus has been ongoing for a number of years and the pre planning meetings schedules would have enabled the applicant to be eligible to apply for the belated SHD application, in my opinion.

There is a constraint in provision of school places and the accommodation at the three school sites requiring new school access on the site at KDA2 are in urgent need. It is not reflected in the social infrastructure audit that the provision of school places is not in line with demand, Many families have to source childcare and education places outside of the town in adjoining neighbourhoods.

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 intellectual 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. Delivery of the three school campus is very urgent.

Open Space

The Open Space are designated allows for Allotment sites. There are currently allotments at the Wonderful Barn in Leixlip which are a pilot programme within the local authority. It should be considered if the plan is for the developments management company will manage these allotments or if the overall plan is for the local authority to manage these.

The Open space area would benefit from some amenities for children for e.g. playground amenities or seating. Suggestions as to sustainable wooden outdoor play areas would make a pleasing addition to the area. There is an acute shortage of open space and amenity facilities for children and young people in the Celbridge area. Many of the sports clubs are full to capacity. There is no swimming pool access in the north of the county. The SHD documentation lists open space at Castletown demesne as available open space, this does not facilitate everyone and ball games are not usually allowed in this historical space. The provision of sustainable and enjoyable open space should consider the sites of gathering points, the secure lighting thereof and the safety for all concerned.

Boundaries and Access

The boundary to the rear of site A poses an issue in terms of privacy for residents. That estate is not as yet in charge so currently remains private property. Permeability ingress should take note that on the drawings in the application, the two permeability access points go through residents private property. The access openings go through a driveway and in the case of another resident, there is no driveway and therefore persons would emerge outside the families' front door. This needs to be reimagined in detailed design to make it workable and not to encroach on the householder's private property.

Care must be taken to ensure the school access road does not create a congested roadway through residential housing estate. If the traffic to schools just backs up a quiet residential area and creates problems for all residents peaceful enjoyment – some of the drawings need to be examined in detail in terms of not routing school traffic through quiet residential cul de sacs.

The boundary at the bottom left is a mature hedgerow which has a wealth of wildlife in terms of birds, hedgehogs, foxes.

The devastating impact this development will have on our hedgehog population (protected species) also our foxes & other animals that live in the fields & hedgerows.

Detail from resident:

"I have the privilege of frequent visits to my garden by our local hedgehog population. In recent weeks a planning permission sign has gone up to develop the field in Ballylutser. I cannot see if an impact on wildlife survey was conducted; as we also have a number of foxes living on that land. The land was originally only to house new schools & we the residents thought the hedgerows would be left intact but this does not seem to be the case anymore. I am really concerned for the animals welfare, as hedgehogs are a protected species."

Designation of sustainable transport solutions:

Celbridge Local Area Plan RDO1.4: To focus the majority of new housing in Celbridge within walking or cycling distance of a school cluster, the town centre, neighbourhood centre or transport routes.

The proposed access road is ancillary to the proposed residential development, it will serve the new residential development (including the currently proposed Phase 1 and future phases), the childcare facility and the lands reserved for the Department of Education / 3 no. schools, which are zoned objective 'E' and which do not preclude the delivery of an access road which will serve the schools and the adjacent residential development on such lands. The proposals include pedestrian and cycle links along the Boulevard to serve the schools and the residential development, and it also includes 2 no. access points to the school lands

Access points

The School road access point should encourage the development of a safe routes to schools / school streets programme and work with An Taisce in order to plan to deliver same.

Road access should not encroach on existing hedgerows and boundaries and should take care to provide for sufficient turning points in case of vehicular access so as not to cause traffic build up.

Pedestrian access points, should signify if it will be allocated for or suitable for bikes, scramblers and e-bikes & Road access at site A. This will mean a different level of access and impact on existing estates if for more than just pedestrian use and will designate if a busy route.

Permeability and road access should be out in place at the boundary of the KDA and at the back of Balyoulster. Would need to retain emergency services road access and L road should be detailed for the rear of Ballyoulster to prevent it from being landlocked in the future.

As there is such a site for a three School campus and the requirement for utility and emergency vehicles to have good access to the site, it is imperative that road access in put in place h

Social Infrastructure Audit

Nama should have made it straightforward for delivery of school campus and proposed residential development at the site Additionally the expansion of the cemetery in the area

School should have delivery of running tracks, basketball courts and should be a high quality campus for the benefit of all school goers.

School place data is out of date and relies on the 2016 census of population. There is a constraint in access to GP services, sports clubs and other amenities for residents.

(Page 17) A childcare facility is proposed as part of the Phase 1 proposals, and can be completed prior to the commencement of dwelling no. 101 if considered necessary by the Board;

Should be conditioned that childcare facilities of an adequate size and appropriate layout for childcare provision should be delivered following development of the 70th home.

The proposed Local Parks will be completed prior to the occupation of 351 no. units; - park should be reassessed in terms of beneficial delivery to the community and provision of this to be made available sooner due to the lack of social infrastructure in the area.

Flood Risks:

There is an identified risk of flooding at the site and with that in mind the green open space area has been moved to the left to cater for any water encroachment. The entire site should be subject to flood risk assessment and not just the housing aspect and amendments made if required to the overall layout or flood mitigation aspect.

Provision of healthcare

There is a constraint in Celbridge in relation to access to GP care, primary care and care at home. This is not reflected in the social infrastructure audit.

Sincerely,

Cllr Nuala Killeen

Celbridge Leixlip Municipal District

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[Health and Wellbeing 6.3 There are no national standards for health provision in Ireland relating to the provision of primary care facilities, residential care facilities or the number of GPs practising per head of population. As outlined above, the health facilities within close proximity of the Ballyoulster SHD subject site consists of a number of GPs and primary care / health centres, in addition to dental practices and pharmacies. The requirement for additional healthcare provision was not identified in the Celbridge LAP for the KDA2 lands.]

Permeability indicative access to residential cul de sac taking into account some open space loss to residents of Willow Crescent. Ingress needs to be reviewed here.



Ballyoulster road access to rear of existing housing – needs access



Notes:

Description: 7 year permission for 344 no. residential units (130 no. houses, 214 no. apartments), creche and associated site works.

Details of provision of housing units

The residential component of the development consists

214 no. apartments / duplex units, and

130 no. houses of to be provided as follows:

- 4 no. 3 bed two storey detached houses;
- 28 no. 3 bed two storey semi-detached houses;
- 48 no. 3 bed two storey terraced houses;
- 50 no. 4 bed three storey semi-detached houses;
- 214 no. duplex apartments / apartments

(54 no. 1 beds,

30 no. 2 beds, and

130 no. 3 beds) in a series of 15 no. duplex apartment / apartment blocks of 3 no. storeys in height, and all duplex apartments / apartments are provided with a terrace / balcony or private garden;

The development includes a total of 585 no. car parking spaces,

4 no. loading bays and

a total of 770 no. cycle spaces.

The proposal includes hard and soft landscaping, lighting, boundary treatments, the provision of public and communal open space, including 3 no. Local Parks, children's play areas, and an ancillary play area for the childcare facility. The proposed development includes road upgrades, alterations and improvements to the Dublin Road / R403 and the Shinkeen Road, including the provision of new vehicular accesses and signalised junctions, pedestrian crossing points, and associated works to facilitate the same. The proposal includes internal roads, including 3 no. bridge crossings, cycle paths, footpaths, with proposed infrastructure and access points provided up to the application site boundary to facilitate potential future connections to adjoining lands.

12.2.2 KDA 2 – BALLYOULSTER The Ballyoulster KDA is located to the east of the town and is bound by the Dublin Road, Donaghcumper cemetery and the Ballyoulster Park housing estate to the north, the Willow housing estate and agricultural lands to the south, the Loughlinstown road to the east and the Shinkeen Road to the west. This KDA is approximately 40 hectares in area with a flat topography. The Shinkeen Stream flows through the lands towards the Donaghcumper Demense and the River Liffey.

KDA 2 Ballyoulster Vision To provide for the development of a new residential neighbourhood, including primary and post primary schools and a local park that integrates with its surroundings whilst having its own unique character and a strong sense of place. Connectivity/ Movement Vehicular access to this KDA should be provided from the Dublin Road, Shinkeen Road and the Loughlinstown Road and should provide for continuous routes through the KDA that connect to surrounding areas. Provision should be made for a road connection from the Loughlinstown Road to the R405/Hazelhatch Road, south of the Willows housing estate, in the longer term. A permeable network of pedestrian and cycle friendly streets and spaces that incorporate existing site features such as the Shinkeen stream and existing mature trees will be required. Built Form The development of this KDA should reflect the established pattern of development in the area. Site layouts should seek to fully integrate the identified primary and post primary school sites. School buildings should be designed to front onto new streets and spaces so that they contribute to the streetscape and the character of this KDA. A mix of housing types that range from two to three storeys in height is encouraged. Landmark / feature buildings should be provided along prominent Celbridge Local Area Plan 2017-2023 Please read the important notice on page 1 in conjunction with this document which concerns lands at Crodaun and at Donaghcumper. 66 routes and at key junctions in order to provide for legibility and variety in the urban environment and to reinforce the proposed hierarchy of streets and spaces. This site will accommodate medium to low-density residential development in the order of 30 units per hectare. Landscape and Spaces The Shinkeen Stream should be incorporated into new developments as a landscape feature that includes a continuous pedestrian and cycle link along its bank. This green link should include natural landscaping that will enhance the ecological value of the stream. New residential areas should be structured around a variety of open spaces that provide for both active and passive recreation. Landscape proposals should provide for the retention of existing mature trees and the planting of new trees along the Ballyoulster/Loughlinstown townland boundary.

From Celbridge Local Area Plan:

Category of Community Facilities List of Existing Facilities

Healthcare 5 No. Medical Centres (Private)

North Kildare Doctors on Call

Religious Facility

Christ Church

St Patrick's Church

Celbridge Christian Church

Garda Station Maynooth Road

Library Library with exhibition spaces

Sport facilities

Celbridge GAA

Ballyoulster AFC

Celbridge Town AFC

Celbridge Tennis Clubs

Elm Hall Golf Club

MU Barnhall Rugby Club.

Other Community Facilities and Organisations

Derrybeg Community Supported Farm

The Mill Community Centre

Slip Hall

The ACRE

Table 6.2 Community Facilities in Celbridge

6.3.1 Education

Celbridge is served by three post primary schools and eight primary schools. Two of these schools, St. Patrick's Primary School and Celbridge Community College, are currently operating in temporary buildings pending the identification of permanent school sites. Celbridge is expected to attract young families over the plan period and as such, it is necessary to provide for the further development of educational facilities in order to meet the needs of a growing population. Sites are identified for Community and Educational purposes in a number of Key Development Areas. The Council is also conscious that schools in Celbridge have catchment areas beyond the extent of Celbridge town. Kildare County Council will work with the Department of Education and Skills, under the nationally agreed Memorandum of Understanding on the provision of school sites, to support the Department's Schools Building programme and to proactively identify and acquire appropriately located sites for new primary and post primary schools where the Department has identified a need.

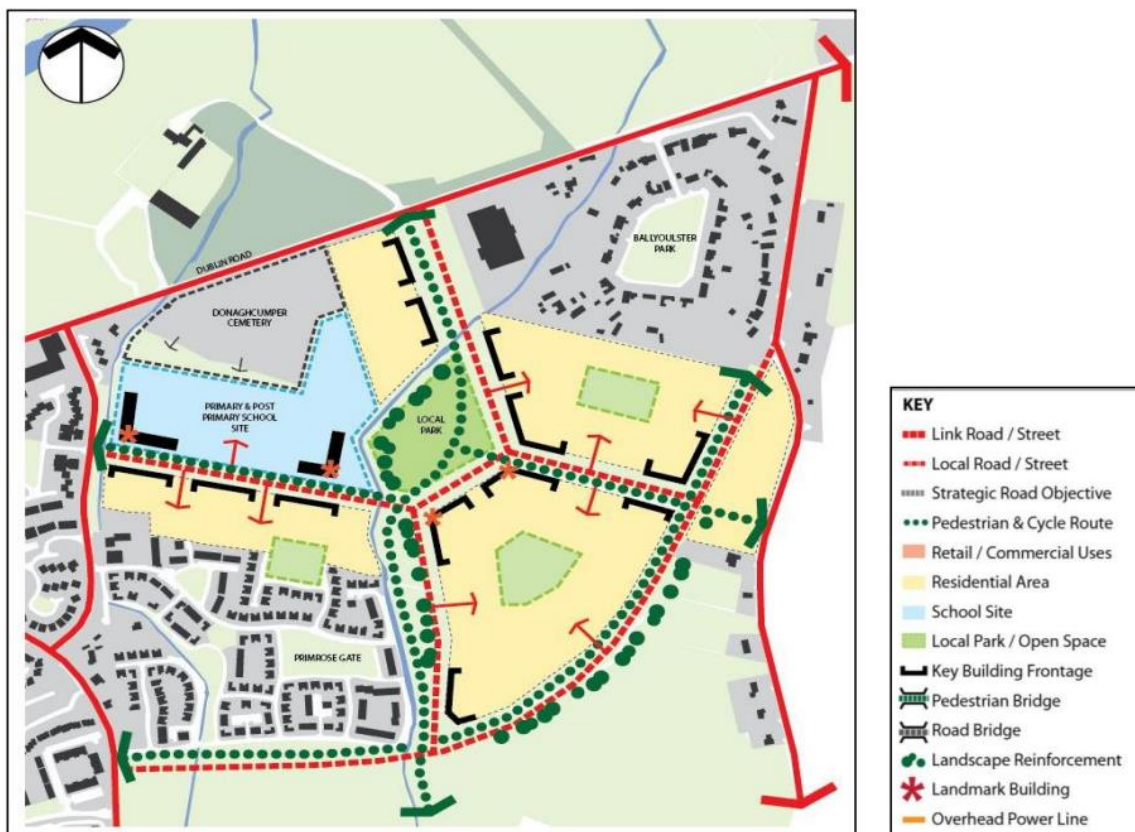


Figure 12.1 Design Concept for KDA 2 Ballyoulster

Notes from CDP:

[Planning Department \(ballyoulstershd.ie\)](http://ballyoulstershd.ie)

Figure 5: Extract of Table 3.3 Settlement Hierarchy – Population and Housing Unit Allocation 2020-2023

Settlement Type	Towns / Villages	2016 Census Pop	2016 Dwellings	Allocated Growth (%) 2020-2023	NPF 2026 Pop Growth in persons	NPF 2026 Pop Growth in housing units	Population Growth 2020 to 2023 (annualised from 2026 NPF Figures) ⁶	Dwellings Target 2020 to 2023
Key Town	Maynooth (MASP ²)	14,585	5,171	10.9%	4,291	1,533	1,839	657
	Naas	21,393	7,726	14.9%	5,866	2,095	2,514	898
Self-Sustaining Growth Town	Newbridge	22,742	8,260	11.6%	4,567	1,631	1,957	699
	Leixlip	15,504	5,524	10.2%	4,016	1,434	1,721	615
	Kildare	8,634	3,158	4.7%	1,850	661	793	283
	Athy	9,677	4,281	4.8%	1,890	675	810	289
Self-Sustaining Town	Celbridge	20,288	6,969	10.0%	3,937	1,406	1,687	603
Sustaining Town	Kilcock	6,093	2,212	4.0%	1,575	562	675	241
	Monasterevin	4,246	1,706	2.6%	1,024	366	439	157

Section 3.4.2 of the CDP encourages a sequential approach to the development of settlements where *'All towns, villages, settlements, rural nodes (as appropriate) should be developed in a sequential manner, with suitable undeveloped lands closest to the core and public transport*

Figure 5: Extract of Table 3.3 Settlement Hierarchy – Population and Housing Unit Allocation 2020-2023

Section 3.4.2 of the CDP encourages a sequential approach to the development of settlements where 'All towns, villages, settlements, rural nodes (as appropriate) should be developed in a sequential manner, with suitable undeveloped lands closest to the core and public transport routes being given preference for development in the first instance.' The proposed development of the subject site is consistent with the sequential approach, as the subject site is situated approximately 1.3km south east of Celbridge Town Centre, adjacent to existing residential areas, established neighbourhood centres and existing transport services, social and community infrastructure and amenities. Importantly, the Ballyoulster KDA 2 lands will accommodate much needed education facilities and the owner of the site is in advanced discussions with the Department of Education with regard to the sale of c. 7.2 hectares of community and education zoned land, which are earmarked for a three school campus (for which an application is expected to come forward in the next 18 months). Taking into account the housing allocation as varied, we outline below how the Phase 1 development, which will be constructed over a c. five year period (with a currently anticipated opening year of 2024) accords with the settlement strategy and population projections for Celbridge, in addition to national and regional policy. This has been informed by a review of extant planning permissions for housing schemes of 5 units and over from the 1st of January 2020 to June 2022, in addition to a review of the delivery of residential units within Celbridge, having regard to a 'Report on Finished, Unfinished and Estates under Construction' published by KCC Building and Development Control in December 2021. (See the Statement of Material Contravention Appendix 1 for a breakdown). It was confirmed by KCC as part of the Stage 2 Tripartite meeting with An Bord Pleanála that the relevant date to include extant permissions is from the 1st January 2020. The proposed 344 no. units would not in itself exceed the housing target for Celbridge (as varied) of 603 no. units in the period 2020-2023. However, it is recognised from a review of the extant permissions for Celbridge (comprising 949 no. units), as set out in Appendix 1 of the Statement of Material Contravention, that the number of permitted residential units in Celbridge do exceed the housing target for 2020 to 2023, albeit this assumes all units will be delivered by 2023 which as set out below is unlikely to be the case. Whilst the proposed development, subject to a grant of permission, will be occupied from c. 2025 onwards, i.e. during the lifetime of the next Development Plan when additional growth will be allocated to Celbridge.

There were increases in the housing stock in all counties. As can be seen in Map 4.1 the largest increases were concentrated in the east.

In Kildare and Meath the stock of habitable dwellings went up by 12%, Wicklow was up 9% and in Louth and Dublin the housing stock rose by 7%. In these areas, the number of dwellings that were occupied went up at a similar rate. These are all areas with some of the lowest levels of vacancy in the State.