



NPF Submissions  
Forward Planning Section  
Department of Housing, Planning, Community and Local Government  
Custom House  
Dublin D01 W6X0

### **Submission on National Planning Framework Ireland 2040 Plan**

Dear Sir / Madam

As a voluntary group, Celbridge Community Council welcomes the opportunity to make a submission on the National Planning Framework 2040 plan.

Celbridge Community Council was established as a voluntary community group in 1975 and has for over forty 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.

#### **Celbridge in Context**

Our submission is guided by Celbridge's experiences of over four decades of rapid expansion as a commuter town in the Greater Dublin metropolitan area. While the National Planning Framework needs strategies to ensure that the mistakes of the past are not repeated, it is crucial that it also contains strategies to redress infrastructural deficits that should never have been allowed arise in towns like Celbridge. Celbridge Community Council acknowledges the need to take a national perspective but wishes to underpin this submission with the following points which illustrate how poor planning strategies and implementation mechanisms have negatively impacted Celbridge:

- A. Restraint must be exercised in the rate of Celbridge's population growth in line with its position on the settlement hierarchy. Celbridge has been designated as a "Moderate Sustainable Growth Town" by the Greater Dublin Area RPGs yet has been the 3rd largest town in Co. Kildare for almost 2 decades with a 114% population growth rate since 1991.
- B. At the current level of population, serious social infrastructure deficits are evident within Celbridge. Until they are redressed, the town cannot absorb additional population. Celbridge cannot be sidelined for investment in social infrastructure when its population and demographic breakdown dictates the need for a much higher level of commitment.
- C. 14 years on from the opening of access to the M4 via the Junction 6 interchange, movement within Celbridge has again become a serious problem due to traffic gridlock. The negative impact this has on the quality of commuters' lives has increased steadily in line with post-recession economic recovery. Celbridge has seen a 45% population increase since Census 2002 (before Junction 6 opened) and, if targets from the County Development Plan and Local Area Plan (latter currently in Draft form) are upheld, that percentage increase is likely to exceed 100% by 2026. Strategies such as the following need to be implemented to diffuse the problem before any further significant population increase can occur:
  - a. Completion of an additional river crossing is essential in the near term.



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- b. Completion of a ring-road is essential to divert traffic from pinch points in the road network.
  - c. Public transport connectivity between Celbridge and surrounding areas and within Celbridge itself must be prioritised in order to reduce the numbers needing to commute by car. Routes to and from Dublin do not serve the needs of many living in Celbridge who travel for work, education, hospital appointments etc.
  - d. A clear strategy for maintaining and invigorating economic activity towards a more sustainable level is essential. This must focus on generation of quality local employment opportunities to reduce the numbers needing to commute by car.
- D. Where development of a number of neighbouring towns is interlinked in the context of an economic growth cluster, guidelines need to be available on how this should happen. Celbridge is part of what the County Development Plan fuzzily defines as the “North Kildare Economic Growth Cluster” but there is no known strategy behind it.
- a. Celbridge cannot repeatedly lose out on employment generating activities to its neighbouring towns because it is perceived to “just” play a supporting role in the “North Kildare Economic Growth Cluster” and economic development must be prioritised for the Celbridge area to at least keep pace with population growth in a sustainable manner.
  - b. All citizens living within an economic growth cluster should be afforded the same right to quality of life so facilities need to follow the population and, since Celbridge is the 3<sup>rd</sup> largest town in Co. Kildare, it should have far more facilities than it currently has. If Celbridge is to “lose out” to neighbouring towns for facilities such as swimming pools, performing arts venues etc. then a public transport connection needs to be provided to take people from Celbridge to these facilities.

## Key Questions

In this submission, Celbridge Community Council attempts to answer a number of the key questions posed by “Ireland 2040 - Our Plan - Issues and Choices” paper available on [www.npf.ie](http://www.npf.ie) as follows:

- What policies can the NPF include to effect improvements to our general health, including physical and mental well-being, in Ireland over the next twenty years?
  - Prioritise quality of life considerations in all planning decisions by focusing on rectification of existing deficits in social infrastructure, forward planning for adequate leisure/recreation facilities and reduction of commuting times
- Are there key priorities the NPF can identify to ensure better or improved health and wellbeing of people and places in Ireland?
  - Reduction of car dependency and enhancement of the reach of public transport networks to reduce time spent commuting
  - Incentivise development of leisure facilities to serve all members of society (such as swimming pools, skate parks, playgrounds and outdoor fitness equipment in parks).
- Are there facilities that the NPF needs to highlight for places in Ireland in order to enable greater participation in a healthy lifestyle?
  - Full rollout of bicycle lanes & greenways, as a priority
  - The ratio of population to public swimming pool needs to be reduced and areas that are not currently served by one need to be prioritised. Swimming pools have the potential to reach the widest range of people as exercise in water can be possible for many less mobile people who would struggle without the buoyancy.



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- Taking on board all of the relevant environmental and physical capacity issues, what role should our cities have as part of the NPF?
  - Cities & inner suburban areas should be allocated the vast majority of population increase
  - High capacity transport connections can best be sustained on routes benefitting from critical mass so higher density population growth should be spearheaded in brownfield/infill sites as close to the centre of cities as possible and as close to hubs on the transport network that will carry commuters to employment/education centres within 30 minutes
- How might we develop an urban policy that distinguishes between development within the existing built-up area of cities and towns and greenfield development sites?
  - Greenfield development should be part of regional & national strategies, to ensure the appropriate infrastructure is allocated to areas where population increases are targeted
  - Regional assemblies can play a greater role in prioritising which developments should proceed based on the contribution such development will make to the overall region and then funding from the whole region must follow these decisions (so, for example, funding from the Dublin area could be diverted to towns in reasonable commuting distance if needed to support economic activity in the Dublin region!)
  - Brownfield/infill development should be prioritised where close to employment centres or well connected to the transport network
- How might we distinguish between the role of towns within the wider hinterland of the cities and those located outside the influence of the cities?
  - Most population growth should be consolidated to locations that are within a maximum commute time of 35-40 minutes on public transport from cities to minimise commuter sprawl; this is crucial to curtail commuter stress levels and environmental impact
  - Growth of towns outside the influence of a regional city needs to be sustainable with growth of infrastructure and economic activity occurring in line with population growth so imbalances are not cultivated
  - Regardless of whether a town is within the influence of a city or not, provision of social infrastructure should be fairly balanced and should follow the population so wherever there is a deficit in social infrastructure but critical mass exists to support and require its provision, then the social infrastructure that is lacking needs to be provided
- Are there strategic issues (i) across local authority boundaries or (ii) on an inter-regional basis, that the Regional Assemblies can co-ordinate to ensure more effective sub-regional and regional outcomes?
  - Celbridge is a prime example, lying just 2km from County Dublin and completely within the influence of Dublin. Yet the infrastructure is not aligned, and this is driven largely by an invisible county boundary. Strategic decisions are taken by the Regional Authority, yet it's the Kildare County Council CDP / LAP which are expected to deliver the strategy, despite a limited budget and diverse needs for both a rural & metropolitan population.
  - Transport plans are critical for development at a local level, but transport decisions are taken by the providers & the NTA. This creates a gap in the decision-making process, and allows for an "easy way out" for all stakeholders.
  - The current process is based on the premise that services will follow the population growth. This does not always happen. Where a settlement is strategically located to support economic development of a region, then quality of life within that settlement should be prioritised through funding to rectify deficits and enforcement of conditions on planning relating to the provision of services.
  - A strategy for maintaining existing jobs and creating new employment opportunities needs to be devised that are not overly reliant on multi-nationals (the recent announcement that HP will make 500 workers redundant is a clear indicator that the North Kildare region is at risk from decision-making which lies far beyond the control of the state).



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- What are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?
  - Full rollout of bicycle lanes & greenways
  - Implement public transport initiatives to reduce commuting time and reach more people in the Greater Dublin Metropolitan Area, including DART interconnector, a fast link to the airport and orbital bus routes
  - Introduction of spoke-n-hub public transport nodes and routes to increase the spread of local areas served by buses by connecting orbital, rural and city buses at hubs on high capacity express radial routes to regional cities and employment centres.
  - Affordable park-n-ride facilities for LUAS, DART, rail and bus - Belfast is a great example whereby the cost of parking and a bus transfer to the city centre is combined in a very attractive rate.
- What do we need to do to make best use of existing infrastructure?
  - Perform an audit of public transport connectivity for each town with a sizeable population with consideration for the needs of its population based on demographic profiles then enhance public transport networks to connect more areas with hubs on high capacity transport routes to carry passengers to major employment and retail centres.
  - Redress deficits in infrastructure in heavily populated urban areas to reinvigorate economic activity and improve quality of life so the location becomes attractive for future development
- How can we ensure that the provision of infrastructure can be planned to match future demand and how can the NPF reflect this?
  - Implement policies for high standard of infrastructural provision and enforce the policies through a strong and equitable regional / inter-regional implementation mechanism to protect from complications and variance of standards that arise between different local authorities.
  - Allocate dedicated funding for infrastructure which is protected from short-term government needs
  - Strategic road developments must allow sufficient space for bus routes including provision for turning circles and dedicated bus stops which do not cause traffic delays where a bus route might reasonably be expected to run in the future.
- How do we ensure that existing and new development can be supported by the timely provision of social infrastructure?
  - Decision-making on the provision of social infrastructure should be based on policy that is implemented equitably at regional / inter-regional level to minimise variances between Local Authorities
  - Perform an audit of social and physical infrastructure for each town with a sizeable population to highlight deficits which should be candidates for resolution through public funding and public-private partnerships
  - Further developments should be deferred until any significant deficits in social infrastructure at a settlement are redressed. Funding should be made available at a regional level where a development is located in a strategic location to support the economic development of that region
  - As deficits in social infrastructure are defined relative to existing populations, funding for redressing such deficits should be allocated based on population rather than on strategic settlement hierarchies as many settlements have grown at rates not envisaged by planning strategy
  - Policies with targets for the provision of social infrastructure need to be defined and enforcement of its provision needs to be much stronger so property developers are not allowed leave provision of social infrastructure until the 11<sup>th</sup> hour or “get away” with sub-standard provision. Incentives for property developers to go the extra mile should be introduced to encourage this
  - Impose stringent inspection framework on quality / adequacy of any social infrastructure provided
- When it comes to implementation and monitoring of the NPF, are there common goals that can be identified and apply to every place?
  - The basic human needs of both rural and metropolitan communities are similar and quality of life considerations should underline social infrastructure goals for all communities.
  - While all areas should have local sustainability as a goal, any towns that house large numbers of workers who commute to nearby regional cities will have very different infrastructural needs to rural areas. Decision-making will need to happen at and funding may need to be obtained from the region. Areas



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where critical mass can be built to support the economic activities of a city or vibrant regional town need to be prioritised over places where the return on investment in infrastructure will be poor or negative!

Celbridge's experience under the previous spatial strategy, along with the downstream development plans can help demonstrate flaws in the existing framework.

Celbridge Community Council suggests that you consider using Celbridge in a case study to assess the effectiveness of the NPF strategy for Ireland 2040. Celbridge is suitable for such a study due to the complex range of issues faced by our town:

- Celbridge has been subject to extensive research that highlights deficits in provision of infrastructure under the Celbridge Integrated Services Programme 2016-2020
- Celbridge is situated towards the outer extremities of the Greater Dublin Metropolitan Area and effectively operates as a suburb of Dublin
- Though part of the Greater Dublin Metropolitan Area, developments in Celbridge are funded by a local authority whose purse strings do not adequately stretch to the needs of a town like Celbridge – property tax takings by any of the Dublin local authorities give them far more scope for rectifying glaring problems than Kildare County Council which also has a large rural hinterland area to consider
- Based on 2011 Census figures, Celbridge is the 18<sup>th</sup> largest town in Ireland (excluding Dublin, Cork, Limerick, Galway & Waterford Cities) <sup>1</sup> with a population that exceeds that of a number of large administrative county towns such as Sligo and Tullamore
- Due to its size, Celbridge is an anomaly amongst all towns designated as “Moderate Sustainable Growth Towns” in the Greater Dublin Area Regional Planning Guidelines
- Due to its designation as a “Moderate Sustainable Growth Town” rather than a “Large Growth Town” in the Greater Dublin Area Regional Planning Guidelines, Celbridge tends not to be seen as a priority location for investment; this is despite consistently having the 3<sup>rd</sup> largest population in Co. Kildare for almost 2 decades.
- Celbridge has an acute traffic problem on account of significant population growth putting pressure on a single crossing over the River Liffey – the problems are most evident from 07:45-09:15 on weekday mornings during the academic year, during evening rush hour on weekdays and on Saturdays.
- The percentage of workers from Celbridge who commute to surrounding areas and to Dublin for work is high as employment opportunities in Celbridge itself are limited.
- Celbridge lies in close proximity to Hazelhatch train station but the station is underutilized, largely due to delays & difficulties accessing the station
- Celbridge has a very high level of car dependency
- Gridlock within the town could be relieved by improvements to public transport connectivity, provision of an additional river crossing and changes to movement patterns on the back of the availability of more local employment opportunities.
- In light of the 2015 Celbridge Crossing Feasibility Report conclusion, and on the basis that infrastructural provisions remain a barrier to realising the potential that Celbridge's expansion can play in the vision handed down from the Regional Planning Guidelines, the National Planning Framework needs to provide a mechanism by which a new vehicular bridge can be funded.
- Celbridge residents do not have affordable and feasible transport options to hospitals
- The demographic makeup of Celbridge differs from other parts of the county and Celbridge has a much lower percentage of retirees and a significantly higher percentage of 3-8 person dwellings.
- Tourism has been identified as a key driver for economic activity in Celbridge but development of a strategy needs support

<sup>1</sup> [http://www.cso.ie/en/media/csoie/census/documents/census2011vol1andprofile1/Tables\\_7\\_and\\_12.pdf](http://www.cso.ie/en/media/csoie/census/documents/census2011vol1andprofile1/Tables_7_and_12.pdf)



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- The concept of a North Kildare Economic Cluster has been spoken of in the Greater Dublin Area Regional Planning Guidelines and downstream development plans but it appears to do little more than pay lip service as no concrete strategy for economic / industrial development has been devised for the area.



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We trust that the points raised by Celbridge Community Council will be taken into consideration during the creation of the Ireland2040 Plan.

Finally, we believe that communication channels should remain open during the creation of the Ireland 2040 Plan and would be happy to be of assistance if required.

Yours faithfully,

**David Trost**

**Secretary**

**Celbridge Community Council**

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