

To whom it may concern I wish to make the following submission in regard to the proposed CONFEE Urban Design Framework (KDA).

This is also a mandatory request for the completion of Strategic Environmental Assessment and Appropriate and Environmental Impact Assessment on any development within 500m of St. Catherine's park and the adjoining Lucan Demesne. This Assessment should be carried out by an independent contractor with no connections to the town, holding no conflict of interests. Further assessment is required to inform an effective master plan that supports sustainable, safe, smart development in Leixlip.

I am a resident of Leixlip for 29 years. My professional background is in Environmental Research, Ecology and Conservation, with an educational background; Bachelors and MSc in Sustainable Resource Management. I write this having developed a strong interest in the growing movement in Leixlip to develop and maintain St. Catherine's park as a green space that provides a vital environmental function and service for the surrounding towns. The proposed development plan or possible future development (in any future LAP's or Masterplans) regarding linking the N3 and N4 by constructing a road near the park, an EPA and nearby Natura 3000 site is not feasible. Several impacts are clear from construction, noise pollution, habitat fragmentation, and general disruption. Such an overpass situated in an area void of activity will no doubt attract anti social behavior (e.g. underage drinking and graffiti). Currently efforts have been ongoing to install CCTV in the park and Demesne and promote safety for users particularly during dawn and dusk. The development of such a road, (although admittedly important) must consider impacts on, public engagement and use. It is also imperative that this sensitive ecological areas be protected from direct and indirect impacts of Leixlip's expansion. The Environmental Report clearly states the loss of open space, and amenity use could also be considered to have the potential to give rise to negative effect on population and human health.

Please take heed of this suggestion and warning. We are prepared to go as far as IROPI to prevent negligent planning and development in St. Catherine's park, Confey and Leixlip as a whole.

My objection highlights possible impacts that must be considered from road and housing development. Arguments are broken down into two categories:

- 1) Social, Health, Ecological, impacts of development near St. Catherine's park
- 2) Non-Feasibility of large scale development in Confey

1-Social, Health, Ecological, impacts of development near St. Catherine's park

An Environmental Impact Assessment Report should be completed by an independent Environmental Assessment body to assess the possible impacts to flora, fauna and water quality.

The zoning and development of apartments and housing near Catherine's park will negatively impact a Strategic Open Space that forms part of the green corridor between Leixlip, Lucan and Dunboyne. The presence of several protected plants in this area has been almost completely

neglected by planners and developers in the LAP. Strategic Environmental Assessment must be carried out before any land is zoned to fully assess impacts on native and protected biota.

The proposed development of the Black Avenue in St. Catherines park will cause massive increases in pollution and increased noise levels which will be detrimental for human park users and animals habitants. Such disruption may even have a negative impact on migratory birds that use the area periodically. The development will destroy hedgerows, exiting trees and grasslands and have a negative impact on biodiversity.

The impact of any development on the scenic value of St. Catherines park and the Lucan Demense is a great cause for concern among residents. Any overpass visible from the park of surrounding forests will severely impact the quality of the environment. It is imperative that Appropriate Assessment be carried out in the park and surrounding area so that such structures can be restricted near this area. The Black avenue provides a scenic tour along one of Leixlip's oldest buildings and it is important that this area be included in the assessment. St. Catherines well is located halfway down the Black avenue and provides a rare religious experience facilitating visitors spiritual aspects and once held significance as a place of pilgrimage. This area should not be tarnished by the proposed residential road.

This plan does not enhance the existing built and natural environment of Confey but rather reduces its quality. The Black avenue currently provides a link between the recreational park land and natural woodland. The existing natural environment in the park and surrounding area offers pristine access to nature and relaxation. Thousands of people regularly use the park for recreational sports and walking/jogging. Any development whether residential or infrastructural in this must be strategically situated a safe distance away so as to effectively avoid both direct and indirect impacts to ecology, green space and human health. The massive (and rising) yearly footfall alone through St. Catherines park warrants protection from air pollution. A public road or (possible future transport authority target) major bypass on either side of this area may threaten air quality and have detrimental effects on park engagement, reducing the overall quality of life for locals.

Very little attention or consideration has been paid in the LAP to the protection of Heritage buildings and Protected structures. Several buildings such as St. Catherines well and Castle have been mentioned in development with no concrete plan as to how they will actually be protected. Funding must also be allocated to continue or speed up the restoration and protection of such buildings before any development takes place. The current plan does not provide the conservation plans re Confey graveyard and archaeology sites of interest in the area.

The new LAP includes plans for a new Public park. A new park will be welcomed but we already have issues with the maintenance and upkeep of St. Catherine's Park. If we cannot get the issues resolved with our existing park after almost 20yrs where is funding for the upkeep of this new park. The upkeep and grasscutting is left with the local Confey Soccer and GAA to maintain.

2) Non – Feasability of large scale development in Confey

Confey has been strategically located within the Dublin Metropolitan area. It contains Urban Design Framework but no actual Master Plan as directed by Minister Damien English. This Key Development Area is a major urban expansion into the adjacent grasslands on the Northern perimeter of our town that is being justified on the basis of regional figures and proximity to a rail line. The scale is way in excess of any demand locally and will negatively impact on the current residential population both during its construction and once occupied.

It is highly necessary to conduct Appropriate Assessment and create restrictions on zoning and housing specifications to safely protect the canal waterway ecosystem and surrounding skyline between Confey and Dunboyne. The current LAP proposes the development of two-pedestrian/cycle bridges at Glendale & River Forest. The design and scale are unknown. The knock-on effect on existing residents will be very negative creating a flow of activity into settled residential areas that is unwanted and provides no benefit to the people living in these areas. These proposals will also result in loss of green areas to path / cycle ways. The overlooking of existing homes in close proximity to the bridges is also a serious issue for residents. The scale of these bridges will negatively affect both the existing skyline and general visual aspect of these areas. These routes will also facilitate the criminal fraternity looking to visit the homes on both sides of the bridges. No proposal can be considered that facilitates anti-social behaviors and easier entrance and exit for criminals to the existing residential areas bordering the development area.

The Draft Plan does not reflect or acknowledge the complexity of towns the size of Celbridge, Maynooth and Leixlip lying in such close proximity to each other and sharing the same road networks and Public transport facilities. Any development of Celbridge and Maynooth has a negative knock on impact on Leixlip as our road, bus and rail infrastructure as designed results in passengers and motorists being already in the system before the vehicles reach or pass through our town. The ability of Leixlip residents to access the N4, bus and rail system is already affected by the scale of the exiting populations in Celbridge and Maynooth without any further development of these towns. In all instances once the developers get planning permission, they will look to increase the densities to the max and therefore the total numbers are underestimated. In reality the combined new build will double the size of the residential areas in north Kildare. The numbers in the plan are very misleading in regard to the actual size of the development. The current situation at Wonderful barn is a live example of this type of developer opportunism. The same precedent should not be set in Confey. If an Mbord Pleanala over look the issues with pushing development in Confey they stand to face strong and aggressive opposition.

The proposed works to Cope bridge to provide two way traffic will make the situation worse for residential areas located east and west of Captain's Hill and lead to further congestion at these pinch points during peak times. In particular it will have a negative impact on accessibility from the existing estates and lead to more congestion at the bottom of Captain Hill. Congestion via Captains Hill to schools and local shopping will increase dramatically for residents in existing estates due to increased volumes of traffic. The plan aslo does not adequately factor in the major expansion of Intel's impact on our existing transport infrastructure.

Much of the infrastructure in Leixlip is currently at capacity. The Sewer network for entire area is almost at capacity with no firm plan to extend the capacity to adequately deal with the proposed new development. We have witnessed more power cuts than average, several historic and recent water leaks causing shortages, not to mention the ongoing stench in the middle of our town from the existing sewer systems.

No hydrological analysis has been completed on the effects of this proposed development on hydrological cycles and water quality in Confey. The Confey historical / future flooding risk has been clearly identified. The LAP has no on-site flood risk analysis completed. No criteria offered to show what scale or nature of a development would warrant an on-site flood risk analysis.

The draft LAP proposes phasing/sequencing programme to enable & ensure adequate infrastructure is provided alongside new development. The actual detail in the draft provides no assurance that this development will in fact take place in tandem with the required infrastructure being put in place. The plan discussed zoning Lands to be reserved for the provision of educational facilities, a new community hub to include a community building/civic space, car parking and an extended cemetery. No commitment has been made to actually provide anything.

The park and ride facility according to the LAP will be within the new development. This area will not be close enough to the train station to encourage use. To have a max 50 spaces is silly and an area of at least 300 spaces would be required. Currently train users are parking outside people's homes in Glendale from early morning until late evening. This will certainly not alleviate the existing problem with parking in estates for residents. It will most likely increase issues and spill further into Glendale and River forest residential zones.

The location, scale and identity of the Confey development lands within the framework are apparently to take into account the presence and proximity to the rail line and the future DART expansion programme. The mere proximity to rail line is no basis for anything. The plan is presuming that the future residents will predominately want to travel on the line. In reality the new residents will want to commute in a multidirectional radial route system which simply means the existing road infrastructure will be absolutely overloaded. The future expansion of the Dart will not be within the timeframe of the development plan and therefore no development should proceed until the completion of the upgraded service.

Appropriate Assessment is required additionally in the Confey housing development lands surrounding the proposed housing (Confey GAA). The plan is proposing building heights within the identified higher density lands shall generally provide for 3 to 4 storey buildings but with options to go up to 5 storeys. This scale and height is totally out of line with the character, current built and natural landscape. The integrity of the area at the back of Confey must be protected from multi-storey development. This model of housing has been in place in West Leixlip for many years and it is suggested that it be restricted in Confey to protect the skyline.

Conclusion

The lack of commitment in the documentation is a major problem that undermines the entire plan. The suggestion is that (LAP) & (UDF) must work simultaneously in order to improve access to this new development area and the wider Leixlip area as part of the future development of the strategic road network for the entire area. How long will this take? Unless the road and other network is committed or in place to allow more development proceed will be disastrous for the town and the entire area.

The Draft LAP makes no specific provision for:

- Maintaining green areas and enhancing access to nature and recreation for the people of Leixlip A swimming pool site
- A Sensory Garden.
- Adequate parking in the village, train stations or the proposed new Confey development.
- Improving the aesthetic quality of existing estates,
- Improving and maintaining the existing water, waste & power supply infrastructure which is aging and faulty.

I submit that a more comprehensive Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and finally Environmental Impact Assessment (EIA) must be carried out to assess impacts on the natural green space within and surrounding St. Catherine's park. An additional Appropriate Assessment should be carried out to assess impact on the skyline and the visual sore that the proposed multi-storey housing blocks at Confey train station. The social, logistical, and particularly the environmental implications of the proposed development in the 2019 LAP must be accurately re-assessed. It is possible that with the correct planning and careful consideration, small scale housing and infrastructure development can have a positive impact on this town. The current plans must certainly be reduced and refined.

Thank you

Andrew Colton