

To whom it may concern,

I firstly wish to state that the Ministerial direction of 6th Mar 2018 states that "The revised Draft Leixlip Local Area Plan shall be published not later than 6 months following the issuing of a Direction." As it is now in excess of 1 year since the Ministerial direction Kildare County Council are in fact operating ultra vires.

I wish to make the following submission regarding to the Draft Leixlip Local Area Plan:

1. The draft LAP fails to provide a Master Plan as directed by ministerial order.
2. The National Planning Framework (NPF) states quite clearly that development will be achieved through infill and Brownfield development rather than an over-reliance on greenfield, edge of town development. **The draft LAP is therefore contrary to the NPF.**
3. Key Development Areas that were removed from the last Local Area Plan by unanimously backed Material Alterations have been included again without any reasoned argument to support same.
4. The draft LAP is contrary to S6 – *"To phase significant future growth in line with the capacity and delivery of supporting physical infrastructure"*. The existing water, waste & power supplies are aging and faulty and are unable to support developments of this scale. There is limited capacity at the water treatment works. Improvement works earliest will take place in Q4 - 2022.

The failure to deal with existing infrastructural problems and required upgrades resulting in power cuts, major water leaks and ongoing issues with the sewerage system, shows total lack of appreciation of current problems facing Leixlip, and disregard for current residents of Leixlip and any new residents moving into the proposed new developments.

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.

5. 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.
6. Lands will be reserved for the provision of various facilities with no commitment to actually provide anything. Without commitment, the housing element which is developer funded will be constructed and the new community will then have to fight a rearguard action for decades to get the required infrastructure to match the needs.
7. Multiple infrastructural aspirations are included with no firm commitment of funding identified to deliver same. The plan itself clearly identifies a key to achieving the delivery in a coherent and sustainable manner is the timely delivery of critical supporting infrastructure. A LAP without a guaranteed funding stream is unfortunately not a plan that can deliver this infrastructure, it is simply a wish list.
8. The actual delivery of the target may extend beyond the life of the plan up to 2029 therefore setting out up to ten years construction traffic and work in our town - we should not be rezoning land that will not be developed within the life cycle of this LAP.
9. The policy is to provide a minimum 3,315 new housing units in Leixlip. This is being achieved by increasing housing unit densities at Key Development Areas and inserting new Key Development Areas into the Plan without any documented acceptable reasoning or local demand to justify these decisions.
10. The proposed expansion of housing in particular is completely out of line with the actual local demand. The draft LAP is being proposed to solve a housing issue in

Dublin by putting a disproportionate housing expansion into one of the finest towns in county Kildare. The cost of the housing units in this draft LAP will make the vast majority of the properties on offer outside the reach of the local population.

11. The draft LAP is proposing development at a scale and height that is totally out of line with the character, current built and natural landscape in our town.

12. Any plan for Leixlip cannot be considered in isolation as the town forms part of the greater north Kildare area that includes the sister towns of Celbridge and Maynooth. 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 existing populations in Celbridge and Maynooth without any further development of these towns.

Town	Current Residential Homes	Planned increase
Leixlip	5219	8,534 (+3315) + 64%
Celbridge	6544	9,794 (+3250) +50%
Maynooth	4674	8,216 (+3542) +76%
TOTAL	16,437	26,554 (+10,107) +62%

Town	Currently using Bus/Rail	Projected increase
Leixlip	1,489	2,321 (+ 55%)
Celbridge	1,457	2,071 (+ 42%)
Maynooth	1,291	1,676 (+ 30%)
TOTAL	4,237	6,068 (+1831) +43%

Town	Currently using road network (excl. bus)	Projected increase
Leixlip	4,790	7,776 (+ 62%)
Celbridge	6,906	9,753 (+ 41%)
Maynooth	4,005	5,363 (+ 34%)

TOTAL	15,691	22,892 (+ 7201) +46%
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13. There is a large Brownfield option at the HP site that should be used to resolve the current and future housing requirements of the town. This site already also has access to the motorway system.

14. I believe Collinstown (opposite Intel) is also an ideal location for a new, sustainable settlement of housing: there is employment within walking distance of Collinstown and easy access to the M4; combined with west Leixlip there would be enough population for a Bus-Rapid-Transit corridor through Leixlip or an express service on the M4 – and it's on the railway.

Surely the NAMA land at Collinstown could be transferred to the Council to develop – have the Council consulted with the Land Development Agency in this regard?

15. The LAP provides no road links to M4 or M3 and no plans in place to deliver same.

16. The strategic transport assessment for Confey delivered a number of road infrastructural options. No decision has been made regarding any of these options despite the pivotal importance of them to the entire LAP. The proposed works to Cope Bridge will worsen traffic congestion for residential areas located east and west of Captain's Hill. It will negatively impact on the access for residents in and from their estates.

17. The combined additional traffic from this LAP will bring up to 5,000 additional vehicles on to the local streets which are already experiencing traffic congestion at peak commute times and school start and finish times. It will have very negative impact on traffic flow through Main Street and all the local road network in the Leixlip area.

18. The availability of trains, the capacity of the rolling stock, the frequency of the trains, the usage levels that are currently in play are all matters that are straining the existing train service. The future expansion of the Dart will not be within the time frame of the development plan and therefore no development based on an upgraded high-quality train service should proceed until the completion of the upgraded service.
19. The proposed park and ride facility is not adequate for the numbers of commuters proposed. It will also not be close enough to the train station to encourage use particularly during inclement weather - there is currently a major issue with train users parking in Glendale and other adjacent estates from early morning until late evening which is the source of ongoing inconvenience to the residents. This will only worsen.
20. This LAP will cause massive increases in pollution and increased noise levels in our town.
21. The plan does not adequately factor in the major expansion of Intel's impact on our existing transport infrastructure.
22. MT1.4 No ecological analysis has been completed on the effects of the draft LAP.
23. As a Confey GAA club member I was disgusted and angered at plans for relocation of the club, which came as a complete surprise to all members. The club was founded in 1989 by local people who fundraised relentlessly - as members **we have paid for our club**, it is a community club, not only for GAA activities, facilitating many community groups (basketball, old folks meeting, bridge club, winter cards, darts club, pool club, Irish dancing, set dancing).

It is absurd to state that the land on which Confey GAA is built is underutilized, considering all the activity that takes place in Creighton Park, considering the success we have as a club, the amount of life skills we hand down to our juvenile and adult

players, the use of the facility for many community groups and the efforts of the GAA community in coming together in Confey and establishing such a fine facility.

Confey GAA Club is unique in that we compete at senior level in Hurling, Football and Ladies and we struggle for pitch space for these three senior teams. Added to that we have an excellent juvenile structure in place. We have access to a pitch in St. Catherine's Park but this still does not alleviate the problem of lack of playing space. To add more housing to the area of Confey would pose a considerable difficulty for the club to cater for these new families and so it is important that more pitches are allocated to clubs servicing the new members of the community. Confey GAA would require additional playing fields **adjacent** to our current location to serve any growth in the existing community and playing numbers.

The club was established in its current location so that our members, particularly our juvenile members, could walk in safety to training and games without having to negotiate the ever increasing traffic. The new proposal would bring more traffic. Practically all our members, playing members, mentors, social and juvenile live within walking distance from the club and we encourage them to walk or cycle.

Confey schools (San Carlo and Confey College) utilise our pitches and facilities for matches, sports days, active school week etc. The classes can walk to the club from the schools currently. Relocating the club to the proposed location makes our facilities inaccessible for the existing schools, teachers and school children of Confey. The existing schools do not have the use of or access to alternative pitches or green space within the existing Confey area.

24. The towns historical / future flooding risks have been clearly identified. **The draft LAP has no on-site flood risk analysis completed.** No criteria offered to show what scale or nature of a development will warrant an on-site flood risk analysis.

25. The Draft LAP makes no specific provision for

- Affordable homes

- Social housing
- A civic building with theatre or performance space
- Homes for the elderly/retired – 25% of Leixlip population 55+
- Adequate parking in the village, train stations or the proposed new Confey development
- Maintaining existing estates, green areas or new developments
- Improving and maintaining the existing water, waste & power supply infrastructure which is aging and faulty
- A swimming pool site
- A Sensory Garden
- Charging points for electric vehicles

26. The draft LAP is contrary to S8 which commits the council to protect, enhance, create and connect natural heritage, high quality amenity areas and other green spaces throughout Leixlip for both biodiversity and recreational use. The LAP is in fact threatening and destroying natural heritage, high quality amenity areas and other green spaces in the Leixlip.

27. The draft LAP will destroy 'Key' Green Infrastructure areas (as well as their associated habitats) in our town.

28. Previous objective removed from Plan - *'To protect the amenity of St.Catherine's Park. No road proposal shall be considered by this Council through the park within the Council's ownership or jurisdiction.'* The draft LAP is now in fact proposing a road into the park to facilitate a major housing development at Black Avenue. This change is despite over 1,000 submissions in 2017 regarding protection of St Catherine's Park from road development. To totally ignore the people is dictatorial and undemocratic.

29. The draft LAP does not respect the setting of the subject lands both in terms of design and scale.

30. The draft LAP opens up the possibility of further encroachment into the adjacent farmlands, parks and private estates for future development.
31. The draft LAP is **contrary to the Environmental Report** which 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.
32. The draft LAP will destroy a Strategic Open Spaces that forms part of the green corridors in Leixlip and the surrounding area.
33. Many of the areas original features – trees, hedgerows and grasslands are being removed in this plan, which is contrary to the council's own policies.
- 34. The draft LAP only provides a preliminary design guide for the future development of lands. The requirement by ministerial order is to provide a master plan.**
35. The LAP proposes pedestrian/cycle routes throughout the town. 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 is also a serious issue for residents. No proposal should be considered that facilitates anti-social behaviours and easier entrance and exit for criminals to the existing residential areas bordering the proposed new development areas.
36. The draft LAP is "Encouraging a strong night time economy and presence of residents outside of work hours". I do not understand why this is an objective in the draft plan - Leixlip is not like the financial services centre in the city, where the streets are deserted after normal office hours.

37. This plan does not harmonise with or enhance the existing built and natural environment of Leixlip.

38. The required compulsory purchase of long term residents' homes will be **resisted strongly** by both the individual families and residents generally.

39. The draft LAP does not provide the conservation plans for archaeology sites of interest in the town.

40. The lack of commitment in the documentation is a major problem that undermines the entire plan.

41. Some elements in the draft LAP are regarded to give rise to adverse effects on the integrity of European Sites.

42. The LAP suggests a minor extension to the south and west c. 1 acre of our existing cemetery with no reference to rectifying the existing flooding issues.

43. The LAP identifies serious potential impacts to

- Rye Water Valley
- Disturbance to habitats and species associated with the Rye Water
- River Liffey pNHA through habitat loss and disturbance
- Underlying hydrological conditions and tufa springs

The KCC SEA Environmental Report indicates the LAP has potential significant negative effects on:

- local services and utilities- such as water supply and wastewater infrastructure and electricity demand.
- air quality, noise and climate- due to increased emissions & pollution
- features of archaeological and architectural heritage,
- biodiversity, ecological, land and soil

- the environment
- human health & amenities

44. The backland regeneration off the main street should be used to solve the towns parking deficit, provide a primary care centre and locate some homes for the elderly.

45. The provisions for childcare are totally unsatisfactory for either the current or future population of the town. Leixlip has few (overpriced) childcare providers, and this plan does nothing to provide for potentially a couple of thousand additional children coming into the town. And let's be realistic – these houses are aimed at people getting on the property ladder, young couples, families etc, not older people who have reared their children already.

46. I submit that should any development go ahead no construction traffic is allowed use the Captains Hill or Celbridge roads.

In summary the requirement for Leixlip is to have a plan that deals with the issues already facing the town as it stands rather than looking to expand. Expansion as set out in the Draft LAP will make the existing and future situation intolerable for our residents. It is critical that sympathetic and innovative planning takes place with adequate infrastructure provided in a timely manner to support same. The scale of any future development should match the community's natural expansion requirements not aim at a number just to satisfy a strategic policy that is very distant from the residents of Leixlip who are the primary stakeholders in our town.

The proposed LAP talks about the importance of “proper planning and sustainable development”, and while this is a lovely phrase employed by our elected officials in response to queries and parliamentary questions, this plan does not show any evidence of such forethought. The amount of variables are so great that this proposal would appear to be a disaster waiting to happen, and the people of Leixlip will suffer the fallout.

Present and future generations will thank Kildare County Councillors for taking on board the genuine concerns of the Leixlip population and altering this Draft plan to bring the scale of this development to a level that matches the actual demand for our town and not the greater Dublin area.

I DO NOT AGREE TO ANY DEVELOPMENT THAT WOULD PROMOTE BUILDING A ROAD THROUGH ANY PART OF ST CATHERINE'S PARK.

I DO NOT AGREE TO ANY DEVELOPMENT THAT WOULD RELY ON A ROAD FROM THE M3 TO THE M4 THAT WOULD GO THROUGH ANY PART OF ST. CATHERINE'S PARK.

Leixlip will no longer be a wonderful place to live if these plans go ahead on this scale. Confey will just be another souless vast swathe of houses filled with people let down by our elected officials, as has happened before. There are questions to be asked about this plan:

- It is all very well to “support and facilitate the provision of multi-functional community facilities to meet the needs of the population of the Leixlip Area Plan”: however local authority coffers do not always extend to cover promises made. The phrase “support and facilitate” in no way confirms that provision will happen.
- All Councillors and Council officials should be made to divulge any interests in the lands in question, and any meetings held with the landowners or developers.

Given that these housing proposals will come under the new housing legislation regarding the provision of 100 houses or more, it would appear that the ordinary resident of Leixlip will have no means of appeal aside from instigating High Court proceedings, with the costs involved being beyond the scope of most ordinary people. Highly unfair and hugely unjust.

Please do not approve this plan in its current state – remember the planning mistakes of the past and do not expose us and our children to the difficulties endured only recently by citizens of Kildare and beyond.

Respectfully yours,

Daniel Donohue,

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