

**To whom it may concern I wish to make the following submission in regard to the proposed CONFY Urban Design Framework (KDA) and Black Avenue**

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. An independent contractor should carry out this Assessment 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 twenty six year old student and was born and raised in the lovely village of Leixlip. I have seen it grow and prosper over the years and it's a place that is very close to my heart. I am presently living away as a student but would like to someday return and hope to find a thriving village, which will be a great place to live. However, I am very concerned with the proposed developments that are envisaged for Leixlip as part of the LAP 2020-2026. The following are my objections:

1. 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.
2. The National Planning Framework states that development will be achieved through infill and Brownfield development rather than an over-reliance on Greenfield, edge of town development. The LAP as proposed does the opposite. We have 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.
3. The failure to deal with existing problems within the town and provide the required infrastructure upgrades in advance of any new development shows total disregard for the people of Leixlip and for the problems that will be visited on any new residents moving into the new developments.
4. The plan does not adequately factor in the major expansion of Intel's impact on our existing transport infrastructure.
5. MT3.8 purports to ensure that any significant new development takes place in proximity to public transport routes and can be adequately served by the road

network. This objective is being completely ignored by the proposed new KDA at Confey.

6. 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. It will also result in loss of Hedgerows and green areas at Glendale. Connectivity via Captains Hill to schools and local shopping will be a nightmare for residents in existing estates due to increased volumes of traffic.
  
7. 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 combined development proposed for the towns is absolutely without justification.

<b>Current Residential Homes</b>		<b>Planned Increase</b>
<b>Leixlip</b>	<b>5219</b>	<b>8534 (+3315) + 38%</b>
Celbridge	6544	9794 (+3250)
Maynooth	4674	8216 (+3542)
<b>Total</b>	<b>16,437</b>	<b>26,554 (+10,107) 39%</b>

<b>Current Population</b>		<b>Forecasted Population</b>
<b>Leixlip</b>	<b>15,504</b>	<b>19,794 (+ 4290) + 27%</b>
Celbridge	20,228	22,801
Maynooth	14,585	18,996
<b>Total</b>	<b>50,317</b>	<b>61,591 + 11,272 or 22%</b>

<b>Currently using Bus/Rail</b>		<b>Projected to use Bus/Rail</b>
<b>Leixlip</b>	<b>1489</b>	<b>2321 (+ 55%)</b>
Celbridge	1457	2071 (+ 42%)
Maynooth	1291	1676 (+ 30%)
<b>Total</b>	<b>4237</b>	<b>6068 (+1831) +43%</b>

**Projected increase in Commuters using Road network (not Buses) for work**

<b>Currently using Roads</b>		<b>Projected to use Roads</b>
<b>Leixlip</b>	<b>4790</b>	<b>7776 (+ 62%)</b>
Celbridge	6906	9753 (+ 41%)
Maynooth	4005	5363 (+ 34%)
<b>Total</b>	<b>15691</b>	<b>22892 (+ 7201) +54%</b>

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.

8. This proposed development 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 supply which is aging and faulty are unable to support developments of this scale. The town’s infrastructure is already strained and is evidenced by power cuts, water leaks and the ongoing stench in the middle of our town from the existing houses. There is limited capacity at the water treatment works. Improvement works earliest will take place is Q4 - 2022.
9. 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 Local Area Plan.
10. 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.
11. Irish Water is currently undertaking studies to prepare a Drainage Area Plan (DAP) and model for the Leixlip area. The delivery of the LAP at Confey in accordance with the Urban Design Framework for these lands will require the cooperation of Irish Water. No agreement is in place with Irish water.
12. The development proposes 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.
13. The plan includes the removal of the sporting and social heart of our community Confey GAA. These facilities played a big part in my life while living in Leixlip and I hope to return to using these facilities when I finish my studies. It suggests providing new sporting facilities for Confey GAA to the North West. No detail is outlined of what exactly will be provided, how or when this alternate facility will be in place. The impact to the existing community will be negative as it will be further

away and will not be within ease of walking distance for people who use this as a social hub at present. Loss of employment as Escape Gym would also be affected.

14. This development is contrary to the MASP which clearly states "The integration of transport and land use planning with significant new housing development to be focused at locations proximate to high quality public transport, especially rail access, that is easily accessible to existing local infrastructure such as schools, and local services such as neighborhood centers, in the interest of a sustainable pattern of urban development; ". The existing rail and public transport system cannot be considered high quality by any yardstick and are in fact currently being reviewed with a strong possibility of service reduction rather than improvement.

#### **Black Avenue KDA**

1. This proposed development 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 KDA is in fact threatening and destroying natural heritage, high quality amenity areas and other green spaces in St Catherine's Park.
2. This proposed development is inside the environment of an existing park and can have no positive impact on the park.
3. The proposal provides a significant negative impact on a green and safe access for pedestrian and cyclists using St. Catherine's Park through increased traffic volumes.
4. The existing car park facilities will be reduced as the proposed egress route is via the car park for vehicular traffic from the development.
5. This proposed development does not respect the setting of the subject lands and or the adjoining parklands.
6. This proposed development opens up the possibility of further encroachment into the existing park for future development.

7. This proposed development 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**.
8. The development will destroy a Strategic Open Space, which is right in the middle of proposed Black Avenue housing development in St Catherine's.
9. The egress route from this development is through the car park in St. Catherine's Park, which opens the park to 24/7 vehicular traffic.
10. This proposal will result in the loss of biodiversity through the destruction of woodlands at hill area of the Black Avenue, as the roadway will need to widen to allow two-way traffic.
11. This development will cause massive increases in pollution, increased noise levels, and illegal dumping.
12. The development will destroy hedgerows, existing trees and parklands with five additional pedestrian entrances being created to the park and Glendale meadows.
13. This proposed development will destroy areas of St. Catherine's Park which is considered to be one of the most important or 'Key' Green Infrastructure areas (as well as their associated habitats) in our town.
14. No new linear park is being provided along Black Avenue. The existing linear park which starts at the entrance from the Mill Lane is in affect being reduced and many of its original features – trees, hedgerows and grasslands being removed contrary to the council's own policies.
15. Connectivity via Mill Lane to R148 will be a nightmare for residents due to increased traffic volume, sightlines, narrow road, poor pedestrian walkways and traffic delays.

16. The development will have very negative impact on traffic flow through Main Street.
17. The existing residents Health and Safety is being put at risk due to the traffic implications to response times from Emergency services i.e. Fire Brigade. Which is located in Mill Lane.
18. The egress route from this development is through the car park in St. Catherine's Park, which opens the park to 24/7 vehicular traffic.
19. This proposal will result in the loss of biodiversity through the destruction of woodlands at hill area of the Black Avenue, as the roadway will need to widen to allow two-way traffic
20. This development will cause massive increases in pollution, increased noise levels, and illegal dumping.
21. The development will destroy hedgerows, existing trees and parklands with five additional pedestrian entrances being created to the park and Glendale meadows.
22. The development includes the creation of two pedestrian access routes into existing cul de sacs at Glendale Meadows that will completely alter the current environment in which residents have been living for many years and undermine their property values and way of life.
23. The development facilitates anti-social behaviors and easier entrance and exit for criminals to the existing residential areas bordering the area.
24. The proposal has been rejected on two previous occasions by the council and is simply included to facilitate a private landowner who has landlocked grassland to convert same into a massive financial profit.

## **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.

Signed: Gavin Colton