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Date: 9th July 2019

Planning Department,  
Kildare County Council,  
Aras Chill Dara,  
Devoy Park,  
Naas,  
Co.Kildare

**RE ; Draft Leixlip Local Area Plan 2020 – 2026.**

Dear Sir / Madam,

I wish to make the following submission with regard to the draft Leixlip Local Area Plan 2020 - 2026. Before I outline the issues I have in detail below, I wish to point out that I am not against housing as we all recognise the need for houses.

Table 4.1 Residential Unit assessment provides the breakdown of 3,315 units arising from 10.2% of Kildare's County growth which was assigned to Leixlip. As outlined in the draft LAP, the physical constraints (of the motorway to the south, the railway and Royal canal to the north and west and St. Catherine's Park to the east, the River Liffey to the south and east and the River Rye which divides the town east to west) all contribute to the limitations for the further development of Leixlip. I understand that the County Development Plan is been reviewed before the end of 2019 with regard to the population growth. Taking into consideration the physical constraints of Leixlip as clearly outlined, surely 3,315 additional residential units as per this Draft Leixlip LAP is excessive for Leixlip.

Our democratically elected Councillors for the entire Kildare region voted on the last Draft Lexlip LAP 2017 -2023 in July 2017 and the Planning Authority adopted the Leixlip LAP 2017-2023 on the 20<sup>th</sup> November 2017, the results from the voting taken by councillors on the material alterations would have delivered circa 2,800 new dwellings for Leixlip (including Confey based on the preparation of a Masterplan and brought forward for adjudication etc; ) which would have facilitated further development in a sustainable manner. It is vital that the provision of additional housing in Leixlip is delivered in a way that is not detrimental to the fabric and character of Leixlip and therefore seeking a well-balanced plan for the successful development of Leixlip into the future is imperative.

In order to cater for the proposed increase in our population, it is crucial that the necessary infrastructure combined with the essential community facilities are reviewed properly and implemented effectively. Upon review of the social infrastructure audit completed, I noted that the participation rates on methodology and consultation used for this study were low. This is unfortunate considering it is an important evidence base for the Leixlip Local Area Plan (LAP) 2020-2026 where the principal task is to deliver on Leixlip's potential.

### **Education, Childcare and Health Care Facilities**

The related policy HC3 needs to be updated to reflect the requirement of two primary schools and a secondary school which has been identified as needed in the Social Infrastructure assessment report completed as part of the Draft Leixlip LAP. The provision of a Primary Care Centre also needs to be specified in this policy. This then demonstrates commitment to accommodate these additional requirements arising from the proposed new housing developments.

### **Other Community, Sports and Recreational Facilities**

There is no mention of a swimming pool on the Draft Leixlip LAP 2020-2026. There has been years of an ongoing campaign to have a swimming pool in Leixlip. Included on all the previous LAP including 2002 is an objective to “Promote the development of a swimming pool to serve the people of Leixlip”. It is unacceptable to omit this all important community facility from the current proposed LAP. Leixlip also has one of the largest multi-national corporates which from a financial perspective would greatly assist in the running costs due to the high demand by the employees. A swimming pool needs to be updated onto the Draft Leixlip LAP 2020-2026 considering the National Planning Framework (NPF) deems the position of Leixlip within the Dublin Metropolitan Area. A swimming pool is a necessary requirement in supporting future residential growth and it is not acceptable to exclude the provision of a swimming pool in Leixlip from the Draft Leixlip LAP 2020 – 2026.

In addition, Leixlip needs a cultural, arts and performing centre in Leixlip as there is an abundance of talent in Leixlip as there are a variety of different musical, arts and dance groups in Leixlip. This has already been acknowledged by Kildare County Council by the number of submissions they received on the previous Draft Leixlip LAP 2017-2023. Now is the time to ensure that this performing arts centre is delivered to the residents of Leixlip. Therefore Policy HC4.3 needs to be amended to include “To support and facilitate the provision of a cultural, arts and performing centre in Leixlip “rather than the current proposed objective which is “to support and promote the development of cultural, arts and performance spaces in Leixlip“ which does not provide the necessary commitment or a solid plan to ensure that this is delivered within the lifetime of this draft Leixlip LAP 2020-2026. In addition, Under Policy EDT3- Tourism, Policy EDT3.13 includes “To support the preparation of an integrated tourism and amenity destination on the Wonderful Barn site that accommodates a range of day and evening time uses. This would be an ideal location for a cultural, arts and performing centre to be located within Leixlip assisting with the fulfilment of Policy EDT3.13 with regard to evening time use.

The current playground located at the Leixlip Amenities is a very small play facility when compared to the much larger playground in Maynooth or the playground located in St Catherine’s Park which is not within the boundary of the Leixlip LAP. Therefore, Leixlip requires a playground of a similar size to that mentioned to facilitate children of all ages.

A lack of adequate social infrastructure fails to support existing and new communities. This leads to serious social problems, as proven in other suburban areas in Dublin where planning have not provided for the community. Now is the opportunity to provide for such facilities within the proposed Draft Leixlip LAP 2020-2026, all of which has been requested by the residents of Leixlip for years.

### **Waste Water/Sewerage and Water Supply**

Per the sustainable Planning and Infrastructure assessment report dated 30<sup>th</sup> May 2019, all sites will be served by the Leixlip Wastewater Treatment Works / Lower Liffey Valley Sewerage scheme which has a capacity of 150,000 population equivalent. However, Irish Water has advised that there is limited capacity at the treatment works. Irish Water has two projects currently underway to cater

for an expanding population within the Lower Liffey Valley catchment (serving Leixlip, Celbridge, Maynooth, Kilcock and Straffan) and for the locally based commercial activities (including Intel). The previous draft Leixlip LAP 2017-2023 clearly stated that following the upgrade of the Leixlip Waste Water Treatment plan it will continue to have insufficient capacity to cater for the planned growth in the longer term. The current Draft Leixlip LAP 2020-2026 makes no reference to this but does advise that the earliest upgrade on the two projects underway will be 2022.

Also included in the sustainable Planning and Infrastructure assessment report dated 30<sup>th</sup> May 2019, it is important to highlight that in Section 4.2.2 of this report Irish Water advises that there is no adequate water main in Confey as currently served by a 3 “ UPV (1969) water main which does not have the capacity to serve significant development. This report also clearly states that Irish Water is responsible for the delivery of Water service infrastructure however new infrastructure is developer led.

Therefore the zoning and development of lands must be phased in line with the capacity of supporting infrastructure such as water supply and wastewater.

### **Residential Density and Mix**

The previous Draft Leixlip LAP 2017-2023 included an objective (HC02.4) “To apply a 10% Social Housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended) to all sites that are zoned solely for residential use or for a mixture of residential and other uses. I note that this objective has been completely excluded from the current Draft Leixlip LAP 2020-2026 and instead a new objective inserted (HC2.3) to include “To seek to provide Traveller Specific Accommodation at appropriate locations close to key services and public transport facilities in accordance with the Traveller Needs Assessment and Traveller Accommodation Plan due for review in 2019”.

I propose that the policy (HC02.4) included on the previous Draft Leixlip LAP 2017-2023 is included on the current Draft Leixlip LAP 2020-2026 instead of the current proposed objective (HC2.3) as objective HC02.4 is inclusive of all sectors of society with regard to social housing requirement rather than specifically highlighting the traveller community as they too are accommodated under HC02.4.

### **Roads**

Policy MT3 with regard to Roads needs to include an additional objective with regard to the protection of St Catherine’s Park as follows:

'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.'

A Strategic Transport Assessment for Leixlip indicates that a new road to the west of Confey, parallel to the Royal Canal and coming through the eastern edge of the Intel site to meet the Maynooth Road west of Louisa Bridge Station is a preferred route option to serve the new lands to be developed at Confey. To the East the preferred option is to upgrade existing roads and facilities from Leixlip Town Centre to Lucan. In the Leixlip Strategic Transportation Assessment an Eastern Link was looked at, which was East of the St. Catherines Park Lands, but it was indicated that it would be difficult to achieve for a number of technical and social reasons. This Eastern Link which is outside of the St. Catherine's Park Lands is commented on as follows - *While such a link may become increasingly warranted at a later date as development occurs, by 2025 it is not favoured*'. So overall there is no suggestion of a road through St. Catherine's Park. Hence, it is not acceptable to clearly omit this objective which was agreed by all the councillors when discussing the last Draft Leixlip LAP 2017-2023. Therefore, the above objective needs to be included in the Draft Leixlip LAP

2020-2026 stating quite clearly that no such proposal of a road going through St Catherine's Park will be considered. This would ensure the integrity of the Park for future generations.

### **Traffic**

As detailed on Leixlip Strategic Transportation Assessment report dated May 2019 commissioned by Kildare County Council to inform the drafting of the revised Draft Leixlip LAP 2020-2026, this report noted that Leixlip Transport challenges are overall connectivity between communities' residences and destinations in Leixlip (and further afield) is poor because of the natural topography and geographic features – Rye Water and River Liffey exhibit steep gradients which have historically restricted growth areas. Furthermore, the built environment of the Royal Canals and longstanding railway act as permeability barriers. A limited number of crossing points over the Rye Valley, Royal Canal and railway line inhibit travel by almost all modes of transport creating pinch points such as Cope Bridge, Captain's Hill, Kellystown Lane Bridge.

Therefore circulation around and through the town is constrained. The proposed Key Development Areas will have a significant impact on traffic congestion in Leixlip. This will lead to concerns regarding safety due to the increased pressure on already inadequate road infrastructure.

Therefore it is important that a Traffic Impact Assessment is completed before any development work commences on any KDA to ensure that the individual and cumulative impact of the planned key development areas on the strategic road network is recorded accurately. The recommendations from each traffic impact assessment should also be implemented in advance of any development works commencing. This is crucial as it is not sufficient that this be determined on a case by case basis.

A traffic calming measure needs to be considered on the Green Lane road to the right as you exit from the Easton Road Cul De Sac. The traffic speeds up on the way to schools in the morning etc; and it makes it very dangerous and difficult to exit along with a slight bend on the road. With one residential development currently been built and the other proposed residential development (Leixlip Gate) now been considered for development, the impact on the Green Lane road needs to be carefully considered and measures implemented.

### **Built Heritage**

The parklands of the Wonderful Barn needs to be enhanced to a high quality amenity area and green space for both biodiversity and recreational use. As part of promoting The Wonderful Barn as an integrated tourism attraction we need to include a large playground on the scale of St Catherine's park with an adjacent Skateboard park and the provision of a picnic area. The Draft Leixlip LAP 2020-2026 section EDT3.10 refer to a detailed conservation and management plan. It would be very beneficial if this could include a layer of public consultation to address any community conservation concerns and to capture any other great ideas.

### **Town Centre**

There are a number of vacant properties in main street Leixlip, and one that is very unsightly and derelict. In order to ensure the town centre achieves its potential, a vacant site levy needs to be introduced with the sole purpose of urban regeneration in order to prevent and control vacant buildings such as that which is currently visible on the main street of Leixlip. This will also encourage and facilitate the full use of buildings in Main Street which is a significant issue at present in Leixlip.

In addition, I note that Section 5.6 Undesirable Uses of the previous Draft Leixlip Lap 2017-2023 has been totally omitted from the current Draft Leixlip LAP 2020-2026. In this regard, Policy UCR6 regarding Undesirable Uses needs to be inserted into this Draft Leixlip LAP 2020-2026.

With regard to Main Street Backlands Regeneration Objective included in the Draft Leixlip LAP 2020-2026, it provides excellent opportunities whereby the town of Leixlip can be enhanced to make it more vibrant. In this regard, the design of the Main Street Backlands region should incorporate a number of restaurants in this area. Currently Leixlip is widely recognised to be a town “dying on its feet” so we need to reinforce the town as a visible retail centre and at night time an attractive setting similar to Maynooth which can now be achieved via the Main Street Backlands Area been proposed.

Addressing the lack of current car parking spaces in the town centre is another issue that needs to be addressed which I note is included as part of the development of the Main Street Backlands Area. The car parking spaces in Aldi is not addressing the shortage of car parking in the town as currently cars parked in Aldi for a short period of time is been clamped when they walk down to the town centre to get additional shopping. There is limited on-street car parking on main street so public car parking spaces needs to be provided and now is the opportunity to ensure that this happens for both the residents and businesses.

### **Protected Structures**

The insertion of an additional objective under Policy BH1 to include “To address dereliction, vacancy and promote appropriate and sensitive reuse and rehabilitation of Protected Structures”. was included on the initial Draft Leixlip LAP 2017-2023 however has been omitted on the proposed Draft LAP 2020-2026. This objective needs to be included on the Draft Leixlip LAP 2020-2026 due to the current issue on main street Leixlip which has already been mentioned above relating to vacant properties, one of which is a protected structure but needs to be addressed as has been left unsightly for years.

### **Pollution and Environmental Services**

As part of Policy I5, the Council needs to review the current refuse collection in Leixlip carried out by a number of various private contractors and the impact on the environment from the number of lorries driving in and out of the estate by all the contractors. It would be progressive in light of climate change to include an additional objective under this policy to complete a review of the current procedures with regard to refuse collection in Leixlip by the variety of private contractors in order to consider alternative options that have less harmful effects on the environment.

### **Open Space**

One of the core objectives of the initial draft Leixlip LAP 2017-2023 under Policy OS1 included “To promote and provide amenities / features such as picnic tables, playgrounds or outdoor gym equipment facilities in existing open spaces. This objective has been completely omitted from the Draft Leixlip LAP 2020-2026 and needs to be included. This is essential for the health, wellbeing and social development of a town and especially when the population of Leixlip is due to increase with the proposed developments.

### **Green Infrastructure**

One of the core objectives of the initial draft Leixlip LAP 2017-2023 included “to preserve, protect and enhance trees (including woodlands) of special amenity, nature conservation or landscape value and ensure they are actively managed to ensure their continued longevity”. The proposed Draft Leixlip LAP 2020-2026 under Policy GI1 with reference to specific objective GI1.6 has removed the latter part i.e. “to ensure they are actively managed to ensure their continued longevity”. This is unacceptable and needs to be reinstated to ensure that our Green Infrastructure is protected.

In addition, the initial draft Leixlip LAP 2017-2023 included “Any such proposals for development which would be likely to have a significant effect on natures conservations sites and/or habitats or species of high conservation value will only be approved if it can be ascertained, by means of

Appropriate Assessment or other ecological assessment, that the integrity of these sites will not be adversely affected”. This wording has been completely omitted from the draft Leixlip LAP 2020-2026 and needs to be included in order to protect our Green Infrastructure in Leixlip. Finally, one other objective included in the initial draft Leixlip LAP 2017-2023 “to prohibit development where it is likely that damage would be caused to trees protected by a Tree Protection Objective or to those which have a particular local amenity of nature conservation value. Development that **requires the felling** of mature trees of amenity value, conservation value or special interest notwithstanding the fact that they may not be listed in this plan will be discouraged “. The Draft Leixlip LAP 2020-2026 has revised this wording to just include “To seek to protect trees with a particular local amenity or conservation value”. We need to protect the Green Infrastructure including trees that have local amenity or conservation value. Therefore I oppose the revised wording on the Draft LAP 2020-2026 and wish it to be restated to that on the initial LAP 2017-2023 as detailed above.

### **Celbridge Road East Key Development Area (KDA)**

I refer to the final stage of the last draft for the Leixlip LAP 2017-2023 relating to “Material Alterations” where there was a vote taken by all 40 councillors on the 20th November 2017 to remove the residential zoning for lands at Celbridge Road East (KDA2). Despite this unanimous decision by the councillors it is disappointing to see these lands back on the Draft Leixlip LAP 2020-2026 seeking the zoning of these lands for residential development.

The zoning of these lands should not be permitted on cultural and heritage grounds. Leixlip Castle and Demense are both listed for protection in the County Development Plan. Existing protection orders should not be contravened in the interest of expedient development on this heritage site. The Wonderful Barn has already been zoned, we need to preserve the remaining lands of historical and cultural heritage.

### **The Wonderful Barn KDA**

The previous Draft Leixlip LAP 2017-2023 under Built Form included medium to low density residential development in the order of 30 units per hectare. This has now been increased to 35 units per hectare in the Draft Leixlip LAP 2020-2026 along with giving an option to increase the density even higher where it is determined it does not impact the Wonderful Barn. This is unacceptable as building layout must have regard to the need to protect any views within the site namely from Castletown House which is of historical significance along with ensuring to protect the built heritage of such an asset such as The Wonderful Barn. In order to minimise the visual impact of any new residential development, the proposed development needs to be sensitive to the cultural heritage of the surrounding areas. Hence this area needs to be a low density development restricting all buildings to 2 storey in height.

### **Black Avenue Key Development Area (KDA)**

I oppose the zoning of these lands for residential development due to no current public transport route and no road network. In addition, the proposal provides a negative impact on a green and safe access for pedestrian and cyclists using St. Catherine’s Park through increased traffic volumes. The Planning Department consulted with the Roads and Transportation Department which informed the assessment and infrastructural needs within the plan area. It was noted in the completion of the Sustainable Planning and Infrastructural Assessment dated 30<sup>th</sup> May 2019, the level of congestion in Leixlip with particular reference to Main Street and Mill Lane Junction. This proposed development will further exacerbate the traffic congestion to Main Street. The Fire Station is located in Mill Lane so there is an added concern of the impact of this proposed residential development to the emergency services response times due to the increased traffic congestion which is unacceptable.

The delivery schedule detailed on the Draft Leixlip LAP 2020-2026 for the completion of the various infrastructure to include Roads and Transportation, water and waste water etc; for Black Avenue KDA is from year 4 to 6 years plus. The lifetime of this Draft Leixlip LAP is six years. In order to comply with the National Planning Framework guidelines with specific reference to National Policy Objective 72c *“When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development”*. Therefore, Black Avenue KDA is contravening this objective and is another valid reason why these lands should not be zoned for residential development.

### **Leixlip Gate KDA (Kilmacredock)**

A Noise study as per Kildare Noise Action Plan 2013-2018 needs to be completed on the effect of motorway noise from M4 on KDA4. Physical alterations to site, changes to proposed location of residential units and sound barriers to be completed based on study findings”.

The traffic congestion that zoning these lands will cause on the existing road network is a huge issue which needs to be raised. Given that Easton road already serves 8 existing housing estates (some of which are very large housing estates) it is imperative that the Traffic Impact Assessments are completed and the recommendations implemented in advance of the commencement of the proposed development at KDA4.

### **Confey**

To date, no detailed masterplan has been prepared for the lands located in Confey which is what all the residents has been awaiting for the last two years as detailed by the many submissions received relating to the last Draft Leixlip LAP 2017-2023 and expressed by the councillors at the Material Alterations stage and hence, the result of the vote was no zoning of these lands back on 20<sup>th</sup> November 2017.

The Urban Design Framework Document is a preliminary design guide for the future development of these lands. It is not a masterplan. No lands in Confey should be zoned residential until a detailed masterplan is prepared for Confey and fully agreed with Kildare County Council subject to public consultation and in agreement with the Elected Members of Leixlip / Celbridge Municipal District prior to the granting of any planning permission on these lands. The masterplan must accord to the site specific objectives identified in this Draft Leixlip LAP 2020-2026 as well as relevant site development standards set out in the County Development Plan.

Kind regards,

Hilary Dunne