

AOS

PLANNING

Planning Specialists for Strategic
Infrastructure and Industry

SUBMISSION TO DRAFT LEIXLIP LAP 2020-2026

ON BEHALF OF
INTEL IRELAND LTD

1st Floor,
24-26 Ormond Quay
Upper,
Dublin 7 D07 DAV9
Tel: 01 874 7704
Web: www.aosplanning.ie

Contents

| | |
|---|-----------|
| Foreward | 3 |
| Site Interest | 4 |
| Background | 5 |
| National and Regional Context..... | 6 |
| Concentration of Infrastructure and Opportunity..... | 7 |
| Addressing Local Context | 8 |
| Achieving National, Regional and Local Objectives | 10 |
| Framework Considerations for a future masterplan - Achieving Local Objectives | 11 |
| Adjusting to Local Context..... | 12 |
| Maximising Regional Use and meeting Local Need | 12 |
| Masterplan Content | 14 |
| Draft LAP Masterplan Format..... | 15 |
| Summary Observations..... | 16 |

Foreward

We note that Kildare County Council are in the process of preparing the Leixlip Local Area Plan 2020-2026, which includes provisions relating to strategically identified lands at Collinstown, for employment-generating uses, growth and development. These lands adjoin the existing Intel site campus which has been in-situ since 1989, and also encompass lands in Intel ownership within the designated Masterplan envelope.

Intel Ireland Ltd welcomes the opportunity to participate in the LAP-making process as a long-standing, integral part of Leixlip's community of businesses and residents. Intel supports industrial, research and community activities, and is a significant enabler for general economic and commercial growth in the region.

Local Areas Plans play a critical role in providing the guiding framework for growth and development in an area, by providing valuable certainty and clarity – especially in the context of local priorities and sensitivities. LAPs also capture the 'bigger picture' relating to the County Council's wider vision and objectives for enhancing the local community, its economy and its environment.

Our submission supports:

- The LAP objective of focussing on North Kildare's existing sectoral strengths in high-tech/biotechnology, research and development, as well as information and communications technology.
- The Council's high-level vision and objectives for the 'Collinstown Masterplan' lands. Our submission also provides suggestions – based on detailed knowledge and experience of the area gathered over many years – on how the LAP might be amended in order to ensure that the stated objectives can be most fully met, in the shortest time.
- The view that these lands have the potential to play a vital role in realising objectives to facilitate, promote and support the development of strategic economic and employment generating growth and development.
- A more flexible approach, aligned with specific contextual strategies – based on local knowledge and evidence-based assessments – that may facilitate outcomes that will meet the needs of the widest range of local interests and concerns. We believe that such an approach will best facilitate meeting the most ambitious objective(s), in the least time, with the greatest certainty.

We note and support the fact that national and regional plans specifically identify lands at Collinstown, as being Strategic Employment Development lands within the North Western Corridor. We also note and support the Kildare County Development Plan 2017-2023 (CDP) which contains an Economic Development Strategy for the county. This identifies Leixlip, together with Maynooth, Celbridge and Kilcock, as forming part of a Primary Economic Growth Cluster to be developed in a mutually dependent way to realise economies of scale. In this regard, a knowledge-based economy, focusing on high-tech/biotechnology, research and development, information and communications technology, and manufacturing, is identified as a sectoral strength for North Kildare.

Intel, KCC, and the other 'Collinstown Masterplan lands' owners, have the opportunity to move forward and proactively work towards 'unlocking' the growth and development potential of these lands, in accordance with the stated policy objectives.

Our submission is premised on the fact that the area presents opportunities of regional, if not national significance, which need to be utilised to a degree commensurate with this significance.

Site Interest

This submission is made as an observation in relation to provisions associated with the 'Collinstown Masterplan' lands, as outlined in the Draft Leixlip LAP 2020-2026 because Intel own lands within this area. This submission sets out commentary and suggested amendments in relation to these provisions, especially in the context of their applicability to lands within the ownership of Intel.

Over the past 30 years the Intel campus has gradually been developed for manufacturing and associated activities. Lands owned by Intel include the Intel campus site itself, as well as lands located in the 'Collinstown Masterplan' area, as indicated in the figure below.



Figure 1 Intel Collinstown lands

Source: Google Maps (2019)

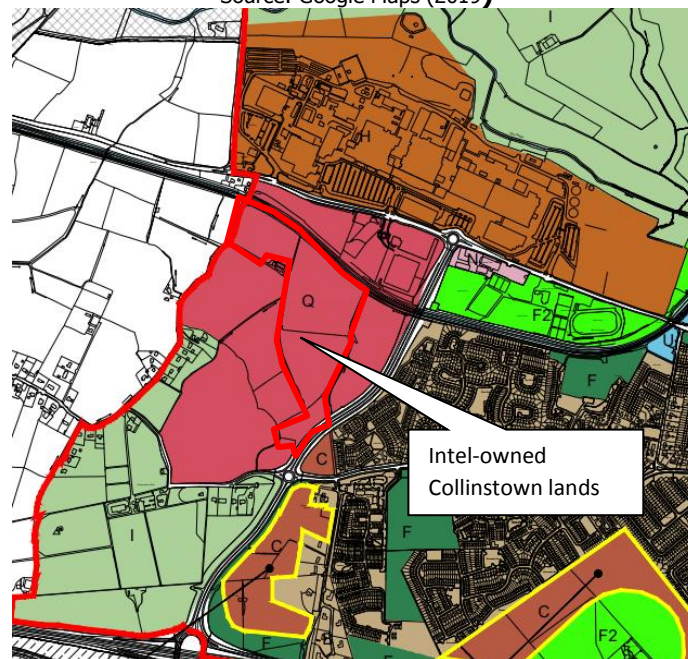


Figure 2 Intel lands in context of LAP

Background

The Planning and Development (Amendment) Act 2010 introduced important new legal obligations on planning authorities to ensure that LAPs comply with devised Core Strategies contained in the relevant county/city development plan. This duty extends to the provision of employment and jobs as highlighted in the national guidelines on the preparation of LAPS - Local Area Plans Guidelines for Planning Authorities 2013, Department of Environment, Community and Local Government. In relation to the content of LAPs, specifically, Section 5 of these guidelines identifies the explicit need to promote local economic development and employment growth by focusing on the prevalent issues in an area.

We note the contents of the Draft Leixlip LAP, the current LAP, as well as the objectives and statements pertinent to the Collinstown lands, as reflected in the Draft EMRSES¹ and associated MASP. This submission has been framed in the context of these documents as well as via the input of Intel as a key industry, and current ongoing assessments/ studies which assist in informing a potential development framework for the lands.

The EMRSES and MASP are aligned with national strategic outcomes of the NPF and NDP to ensure that it can inform national-level sectoral investment plans and co-ordinate investment within the metropolitan area. This is an important consideration in terms of being able to leverage public investment in future infrastructure provision/ expansion.

At a time of significant long term national, regional and local planning, it is critical that the appropriate conditions are created to nurture growth in the county and region. On the basis of scale, return on investment, and track record of delivery as well as collective ambition, Intel, KCC, and the other 'Collinstown Masterplan lands' owners, have the opportunity to move forward and proactively work towards 'unlocking' the growth and development potential of these lands, in accordance with the stated policy objectives.

¹ EMRSES – *Eastern and Midlands Regional Spatial and Economic Strategy*

MASP – *Dublin Metropolitan Area Strategic Plan*

NPF – *National Planning Framework*

NDP – *National Development Plan*

National and Regional Context

Collinstown lies within one of Ireland's best endowed areas for economic development - a small area near the junction between the counties of Kildare, Dublin² [FCC, SDCC] and Meath.

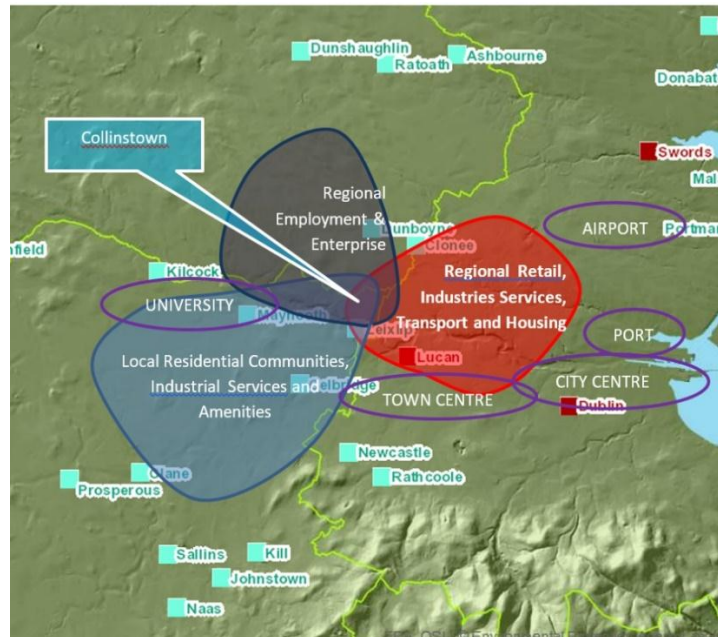


Figure 3 Collinstown lies at the heart of an area uniquely endowed with regional opportunity

This key strategic potential is specifically recognised in the Metropolitan Area Spatial Plan (MASP), which forms part of the RSES for the Eastern and Midlands region – where it sets out a 12-year strategic planning and investment framework for the Dublin Metropolitan Area. It specifically identifies lands at Collinstown, and the Hewlett Packard site, as being Strategic Employment Development lands within the North Western Corridor – identified as a key public transport corridor.

This small zone contains a remarkable concentration of existing infrastructure and employment investment, as well as immediate access to major labour-force concentrations for existing and future employers.

Furthermore, recent major public expenditure on transportation services, creates opportunities for availing of underutilised, 'reverse flow' capacity at peak times, that will reduce the growth of traffic on the M50 and its junctions.

The near-term development of this area also offers immediate opportunities to address emerging capacity issues of housing, congestion, utilities and competitiveness.

Summary

This location provides regionally significant opportunities for short-term returns on very high concentrations of recent public capital investment in infrastructure, including transportation.

² 'Dublin' is described as a County – notwithstanding that, in this instance, it consists of South Dublin and Fingal Councils.

Concentration of Infrastructure and Opportunity

The wider area (i.e. relative to the junction area between Kildare, Dublin [FCC & SDCC] and Meath) is bound by three of the country's largest electrical substations, and is also served by the main supply of the national Gas Pipeline. In addition, it accesses the nation's largest waste water and water supply systems. It contains 13 Motorway junctions, 7 commuter rail stations, and two major park and ride facilities. Furthermore, the location outside the M50 means that at peak periods, this area has very large quantities of under-used 'reverse flow' capacity on rail, bus and road routes.

No part of the area is more than 25 minutes from Dublin Airport, Dublin Port or Dublin City Centre. The most affordable housing in the Leinster region lies within the central and western part of this area – which is also the area with the greatest potential to deliver the nation's earliest new residential developments of scale.

The area is bound along its southern boundary by the River Liffey Corridor – which is the region's most important [if underdeveloped] ecological and recreational amenity. It also contains a University, one of the country's largest shopping centres, as well as a significant concentration of office, warehouse and other support services for enterprise.

Summary

This concentration of infrastructure and opportunity, together with the specific identification by national and regional plans of Collinstown, *inter alia*, implies obligations to ensure that the highest returns to the economy of the county, and region, will be obtained from any zoning and subsequent development of these lands.

Addressing Local Context

To ensure the realisation of the proposed regional role for these lands, it is submitted that the existing Draft Indicative Design Concept layout for the Collinstown Masterplan lands should be omitted from the Leixlip LAP, as any future masterplan layout proposal will need to take account of specific site feasibility, analysis, technical considerations and context. The following specific local issues are accordingly highlighted for illustrative purposes.

Recreation and Open Space Provisions

Contrary to the Draft LAP Core Strategy Concept Map (Figure 4.1 of the Draft LAP), the indicative Masterplan Design Concept Plan proposes open space/ amenity lands along the southern boundary of the railway line that have no physical or visual access to the Royal Canal³, and are also limited to some extent with regard to their proximity to the Intel Campus. Lands adjacent to the Suburban Railway Line are thus likely to be constrained by these two local factors:

1. Proximity to a SEVESO site (refer also to Appendix 1) – limits the range of uses
2. Proximity to a suburban rail line that reduces access, and visual amenity

1. SEVESO Considerations

Land-uses within the northern extent of the Collinstown Masterplan lands and along the southern boundary of the railway line should be limited to those compatible with provisions. According to An Bord Pleanála it is crucial to consider the “*need in the long term*”⁴ when considering land use activities in the vicinity of Seveso sites, rather than focusing only on the specific impacts as they are understood at a particular time. Further detail relating to Seveso sites is included at **Appendix 1**.

2. Proximity to Railway and Canal

The Royal Canal tow-path is part of the Royal Canal Way – a National Waymarked Trail which provides an amenity walk and onward pedestrian access to Leixlip and Maynooth. The route follows only the northern bank [see below left].

The Connolly/ Maynooth suburban and Dublin/ Sligo mainline route occupies the southern bank. Access to the southern bank is prohibited and it is fenced from access [see below right]. Dense bank-side vegetation, and a change in level along the southern bank of the Royal canal also restrict views from the canal tow path towards the land that is the subject of the Collinstown Masterplan lands.

The imminent electrification/ upgrade of this line to DART standard will further intensify the line security, and reduce its visual amenity.

³ It is also noted that Figure 11-3 of the Draft LAP does not include identification of the northern bank of the Royal Canal Amenity and towpath as an existing ‘F: Open Space & Amenity’

⁴ “..... it is considered that the proposed development would lead to a restriction on the long-term potential for the future expansion of the facility, contrary to the intent and provisions of such laws. The proposed development would therefore be contrary to the proper planning and development of the area.” An Bord Pleanála Inspector’s report on proposed housing in the environs of a SEVESO site PL 03.126815



Figure 4 Amenity and access is only available along the north bank of the Royal Canal [left photo], the south bank is occupied by a suburban rail line and is inaccessible [right photo]

Summary

The northern portion of the Collinstown Masterplan lands is thus unsuitable for uses which attract large numbers of people, or use as an amenity, on account of proximity to a Seveso site and an intensive use such as a commuter rail line, and lack of visual or physical access to the Canal Amenity.

Roads and Traffic Considerations

It is noted that the indicative access provisions for the Collinstown Masterplan lands is limited to/ concentrated on a singular vehicle access location off the R449 and a pedestrian link across the existing canal and rail.

Whilst the pedestrian link is well positioned to provide good permeability across the hard border of the canal and rail corridor, it should be viewed as a key element to an integrated land use strategy between north and south.

The indicative access indicated into the Masterplan lands on the R449 concentrates traffic flows, and would likely result in a constraint on any proposed land uses and the existing R449. In the context of various assessments (including those relating to roads and traffic) which have recently been undertaken in the area by our client, it is considered that additional accesses, provided in a coordinated system along the R449, would better serve the lands and the existing road network in the area.

It is accordingly suggested that future access/ egress to the Collinstown Masterplan lands be subject to a future agreed 'Collinstown Masterplan', wherein a holistic, evidence/ modelling-based, and more informed approach can be ensured, and which might also be able to take into account any future improvements to the existing R449. Additionally, the Leixlip LAP should consider opportunities for new routes to the south and west of the Collinstown Masterplan lands, connecting the R449/ Green Lane Roundabout to the existing R148 / Royal Canal Way.

Achieving National, Regional and Local Objectives

As has already been highlighted, the opportunity represented by the Collinstown Masterplan lands is a unique commodity – on account of the combined presence of the following factors;

- Access to Motorway
- Adjacency to the nearby settlements and service centres of Lexlip, Maynooth and Celbridge.
- Access to existing commuter rail [a future rail station is also being considered immediately adjoining the northern boundary of these lands]
- Adjacency to a major industrial site
- Adjacency to regionally-scaled utility lines [water, waste water, gas as well as 220kV and 110kV electrical supply.

This is recognised in the Kildare County Development Plan [Objective E03]:

Developing Collinstown as an employment hub in northeast Kildare and ensuring that sufficient lands are zoned for enterprise and employment uses in [the County Development Plan and] Local Area Plans. It is therefore imperative that sufficient and suitable zoned land to facilitate regional scale employment development in Leixlip is provided for within the Local Area Plan

Summary

Very few locations in Ireland are endowed with this combination of assets, so it is important to ensure that the proposed mixture, configuration and policies for uses will optimise and take fullest advantage of the concentration of public investment in infrastructure and private investment in development.

Framework Considerations for a future masterplan - Achieving Local Objectives

The Collinstown Masterplan lands are bound by 6 types of adjoining land-uses. [See Figure]

These provide important guides about the type and location of future land-uses so that the differing needs and objectives of each existing and future land-use can be met.

At a higher level the lands are part of the transition between the more continuous urbanisation of outer Dublin that lies to the east and the more continuous agricultural fabric of north Kildare that lies to the west.



Figure 5 Land-uses within and adjoining Collinstown lands

1. An emerging high-density residential area to the east

This area has excellent links to the services, retail facilities, amenities and transportation links of Leixlip. The railway line limits access of this area to the Royal Canal Way – except at Louisa Bridge and Dee Bridge.

2. A mature large-scale manufacturing/ warehousing area to the north

The majority of these lands are used by Intel for manufacturing and associated activities; other uses include warehousing/ logistics. Intel also own lands within the proposed masterplan plan area.

3. A mature low-density residential area along the southern and western boundary

There are a number of individual dwellings along the roads that surround these lands. A number of these back onto a field that directly adjoins these lands.

4. Agricultural lands to the west

The large regular fields that lie to the west are used for a wide range of agriculture uses, including stud farming, which appears to be a major component.

5. Amenity Corridor along the northern Bank of the Royal Canal

The Royal Canal itself is used for amenity boating and fishing and its northern bank is much used as a designated walking and cycling trail – the Royal Canal Way. It is also designated as a Natural Heritage Area.

6. Infrastructure Corridors along major road, rail and electricity routes.

A major powerline intersects the southern part of the land, while the eastern boundary is formed by a major link road, and a railway line carrying suburban and mainline services bounds the north.

Adjusting to Local Context

The plan will need to meet the needs of existing and future land-users in this area.

These provide important guidance for the detailed objectives of any planning of these lands.

Local considerations are neither uniform nor consistent.

The preservation and provision of residential amenities for lands that immediately adjoin as well as those of the emerging residential areas in the wider context will form important consideration.

The facilitation of continued growth of enterprise at every scale from large to small will also need to be accommodated.

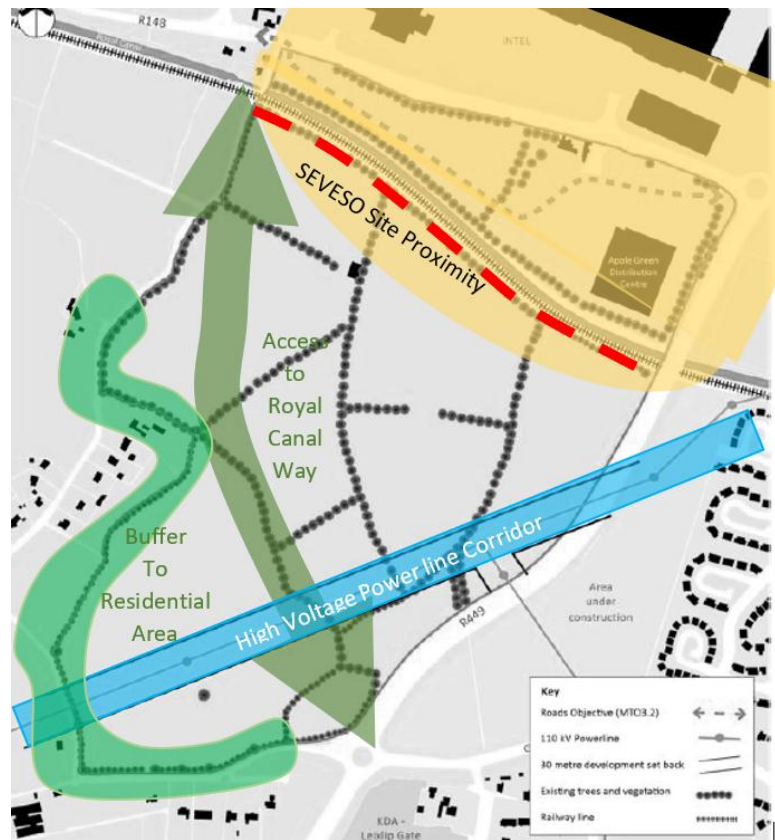


Figure 6 Local considerations affecting future layout

Residential Amenities

These will need to be protected by providing green buffers between existing dwellings, and new non-residential uses.

Enterprise Areas

Existing and future Commercial/ Employment/ Enterprises uses need to be protected by ensuring that adjoining uses conform to SEVESO requirements. This will lead to a requirement to ensure that lower occupancy uses are confined to the north of the lands. Such users/ uses are likely to require a wide and flexible spectrum of sizes and types.

Maximising Regional Use and meeting Local Need

The generalised Site Concept below (subject to further detail and agreement at masterplan design stage), illustrates in plan and section how the strategic nature of the masterplan lands can be maximised, whilst achieving local objectives for amenity and pedestrian connectivity.

The plan and section illustrate a graduated transition of uses from Large Enterprises with High Density Buildings and Low Density Occupation, through Medium Enterprise with Medium density and Occupancy, to Small Enterprise with High Density and High Occupancy to facilitate a critical mass of higher grade business and technology uses at this prominent location closer to the existing roundabout.

This would be combined with the establishment of local green amenity corridors linking emerging residential areas to the Royal Canal Way.

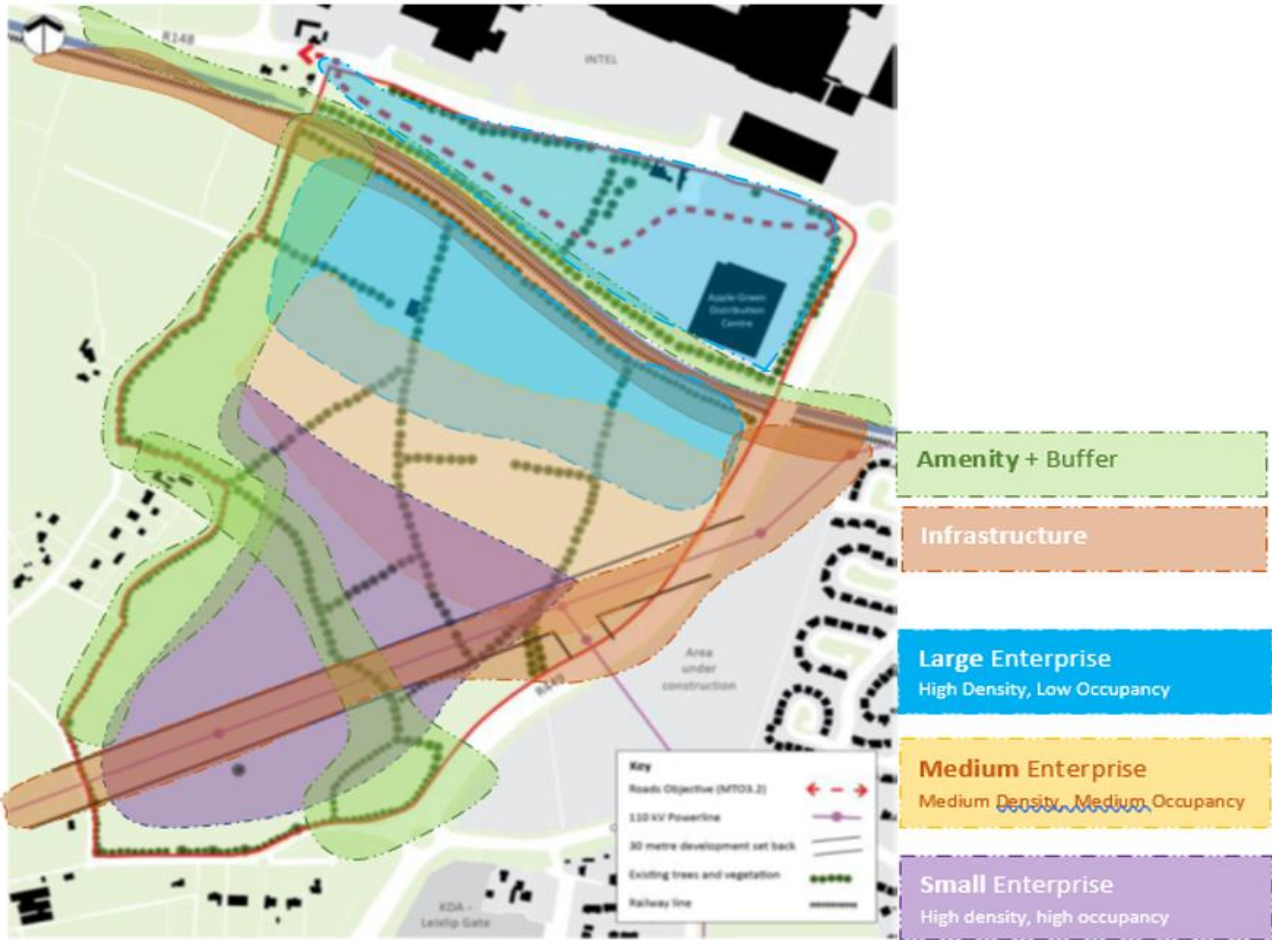


Figure 7 Generalised Site Concept illustrating overlapping location, extent and intensity of future uses

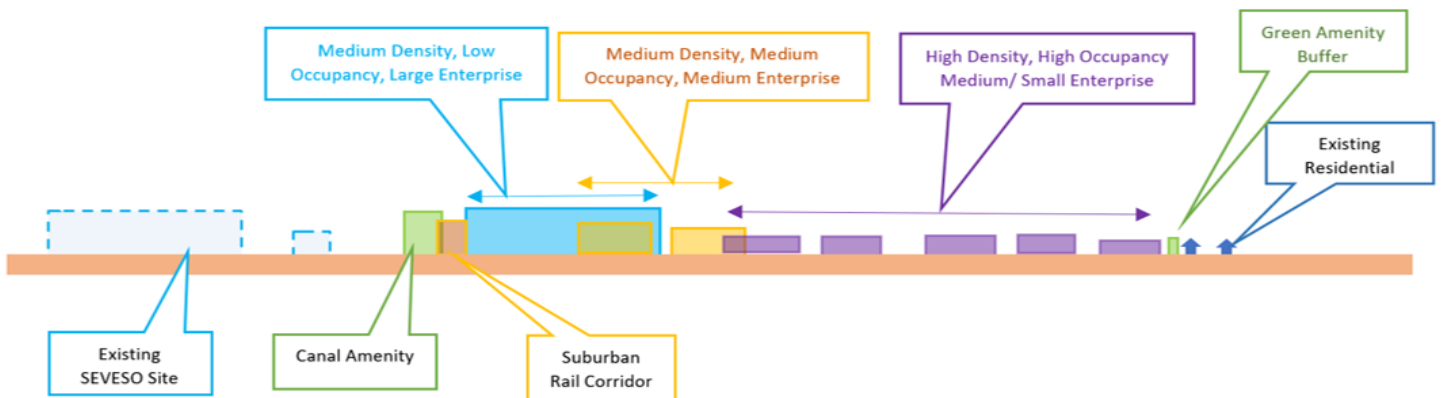


Figure 8 Generalised north-south cross section illustrating graduated height and density of uses in local context

Masterplan Content

It is respectfully submitted that the uses allocated to these lands should be flexible enough to facilitate uses that rely on the scarce attributes that this site possesses. These render it uniquely suitable for higher grade, strategic business, technology, light industrial, and warehousing type uses.

Additionally, and central to any concentrated efforts to achieve employment growth in the local and regional area, is the continued appropriate growth and development of Intel – in enabling the future development of our client’s lands, the potential of the lands can be leveraged, and the objectives of the proposed LAP can be achieved.

Flexibility

In formulating our response and submission, a review of the higher order policy documents (and related draft documents) was undertaken. Critically, it is noted that none of the ‘higher order’ plans are overly or unduly prescriptive in terms of how the strategic employment growth enabling potential of such lands (ie. In the subject instance the ‘Collinstown Masterplan’ lands) may be ‘unlocked’. Relative flexibility is also provided in terms of the Objective (Objective E04) outlined in the current Kildare County Development Plan:

“Developing Collinstown as an employment hub in northeast Kildare and ensuring that sufficient lands are zoned for enterprise and employment uses in [the County Development Plan and] Local Area Plans. It is therefore imperative that sufficient and suitable zoned land to facilitate regional scale employment development in Leixlip is provided for within the Local Area Plan.”

Contrary to the above however, the Draft LAP appears to take an unduly prescriptive approach to the ‘vision’ of how the masterplan lands can/ should be developed – as is reflected in not only the zoning matrix, but also the indicative site block form and layout.

It is critical, for all ‘Collinstown Masterplan’ land owners that a greater degree of flexibility of future uses and layout is extended to the designated masterplan lands and Enterprise & Employment zoning ⁵.

Such flexibility should include consideration of incorporating enterprise, business and (light) industrial/ warehouse uses as ‘Open to Consideration’, recognising that it is not always possible to ‘pigeon hole’ some businesses into one classification over another, and separately that there are often synergies and other mutual benefits to be accrued in providing for different uses within an employment zone. At a strategic scale, this will assist greatly in future-proofing the Masterplan employment land offer, and attracting potential development/ users.

⁵ as per the Draft LAP zoning map; although the Draft LAP Zoning matrix designates these lands as ‘Business & Technology’ – there would thus appear a necessity **to correct and align these in the final LAP**

Draft LAP Masterplan Format

It is respectfully submitted that traditional urban-design format master-planning may not be appropriate for the types and scale of uses that will be required on these lands, i.e. rapidly-changing, high-tech/biotechnology, research and development, information and communications technology, and manufacturing sectors. A future, agreed masterplan will need to accommodate -

- The patterns of land ownership boundaries
- The inherently un-predictable nature of the structures likely to be required for
- The need to provide the flexibility and responsiveness to emerging technology-driven uses
- The need to facilitate regional scale employment development

Accordingly, it is submitted that the future Collinstown Masterplan should be limited to the following agreed principles;-

- The definition of the priority uses types for each zone of the lands
- The identification of critical boundary conditions – by indicative sections especially on the north, west and south
- Key Vehicular Entry Points to the lands [but not to ‘sites’] – informed by traffic/ roads and junction modelling
- Key principle pedestrian/cycle permeability objectives and routes

Summary Observations

- Recognition of the need for development proposals/ land uses to be specifically and demonstrably complementary to an existing industrial use and facility of strategic national, regional and local importance – Concentration and specialisation serves the common (economic) good.
- A future agreed Masterplan framework requires to be informed by a contextual feasibility study. There is a need for the LAP masterplan framework to reflect structured flexibility, and for it to allow a future Masterplan to incorporate a ‘dynamic’ framework which can respond to context change. A lack of flexibility of land use considerations within an agreed framework is likely to stifle any potential development initiatives.
- A wider flexibility of use categories are required to be ‘Open for consideration within the ‘Collinstown Masterplan’ Zoning Matrix in order to better enable and realise the masterplan objectives, and provide a wider scope of means to address market demands; such flexibility provides a recognition of market forces and commercial viability, and thus enables a more feasible and realistic realisation of achieving the masterplan objectives of growth and development.
- The Draft LAP proposed Masterplan Design Concept is considered to be contrary to the provisions of the Seveso Directive, and will result in large concentrations of people, and potentially sensitive land uses (e.g. Neighbourhood; primary care centre and civic plaza) in the vicinity, contrary to conventional best practice which advocates the need to maintain, in the long-term, appropriate distances between large concentrations of people and such sites. The Local Authority has a ‘Duty of Care’, as well as the oversight of proper planning & sustainable development in this regard – in accordance with the Draft LAP objective EDT1.5.
- Access points cannot be indicated at LAP level, but should be informed by the feasibility studies and assessments which will be required to inform the future agreed Masterplan formulation/ drafting stage; its location will require robust Traffic and Transport Assessment (TTA).

Appendix 1

The statutory remit of the Health and Safety Authority consists of an engineering assessment of a particular planning application proposal at a point in time, largely based on results of predictive modelling of the hazards associated with the Seveso facility at that point in time. They do not comment or advise on long term or potential planning impacts or industry trends in their assessment. Long term planning or separation distances are the sole remit and responsibility of planning authorities, Article 13 of the Seveso 3 Directive places a requirement on Planning Authorities to take into account the need, in the long term, to limit the consequences of major accidents in their land-use policies.

There is an equal responsibility placed on the Planning Authority, to limit the consequences of an accident, in the unlikely event that one should occur, by taking the presence of the Seveso site into account in their land use policies.

The Directive requires the Planning Authority to pursue this responsibility through controls on new developments and on locations frequented by the public in the vicinity of existing establishments, where the siting of developments are such as to increase the risk or consequences of a major accident.

Article 13 of the SEVESO 3 Directive (2012/18/EU) states:

1. Member States shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment are taken into account in their land-use policies or other relevant policies. They shall pursue those objectives through controls on:

- (a) the siting of new establishments;*
- (b) modifications to establishments covered by Article 11 (Seveso establishments);*
- (c) new developments including transport routes, **locations of public use** and residential areas in the vicinity of establishments, where the siting or developments may be the source of or increase the risk or consequences of a major accident.*

AND

*2. Member States shall ensure that their land-use or other relevant policies and the procedures for implementing those policies **take account of the need, in the long term:***

- (a) to maintain appropriate safety distances between establishments covered by this Directive and residential areas, buildings and areas of public use, recreational areas, and as far as possible, major transport routes;*