

Response to DRAFT Leixlip Local Area Plan 2020 – 2026

9 July 2019

*Below is a submission by
Residents' Association Committee of Leixlip Park Estate, Leixlip*

The submission from the Residents Association is in relation to the proposed rezoning and residential development of the site identified in the Draft LAP as Celbridge Road East

Section 12.3 Key Development Area: Celbridge Road East

We submit that the plan to rezone and develop the land at Celbridge Road East for residential units should be redacted from the Draft Leixlip LAP 2020-2026.

On consultation with residents of the estate and other Resident Associations located along the Celbridge road area of Leixlip we have compiled the following reasons why the proposed development is unwise and would bring about negative impacts to the standard of living to both current residents in the area and those who would move into said development.

1) Concerns surrounding facilities and amenities within the Leixlip area

There are major concerns among residents that key social and environmental building blocks of a thriving town are not in place in Leixlip to facilitate the growth envisaged by the proposed LAP. Furthermore there is no evidence within the LAP of adequate forward planning, availability of public funds or definitive timelines to address these shortcomings within the lifetime of the LAP or within the expected timeline in which the residential development will proceed.

The building blocks in question include:

- a) Waste Water;
- b) Road and Traffic management upgrades and solutions; and
- c) Community/Recreational facilities.

a) Waste Water

Irish Water has completed its upgrade to the Leixlip Waste Water Facility. As evidenced by the ongoing odour issues in Leixlip, caused by overflow from the treatment plant, this upgrade was insufficient to deal with the demands of the Lower Liffey Catchment Area (Leixlip, Maynooth, Celbridge, Kilkock). Irish Water is putting together a Drainage Action Plan, scheduled to be completed in 2019, to consider the issue. There is no guarantee that this plan will contain any 'quick fixes' to the issue. Even if a fix is identified funding to implement is uncertain given Irish Waters funding continues to be uncertain. The waste water issue may not be address with in the duration of the LAP lifecycle.

The short term fix outlined in the LAP only accounts for 8000 ppe for the towns listed above and given the scale of KCC's County Development plan for the Metropolitan areas of Kildare this is insufficient for the plans for Leixlip, Maynooth, Celbridge and Kilkock.

b) Road and Traffic Management

The Celbridge Road (R404) is unique in Leixlip insofar as it is the only stretch of roadway that has such a wide variety of infrastructure contained within a small section. Located along this 2km stretch of road (Barnhall roundabout to the junction with main street) is a sports facility (Rugby club), a water- sport facility (Leixlip Canoe club), an industrial park (HP Inc.), a Catholic Church (largest of the 2 Catholic churches in the town), 2 shopping centres, a parkland (Wonderful Barn - one of only 2 parklands in LAP boundary area), a fuel station (only one within LAP boundary line), a post primary school (largest of two in the town), a primary school (Leixlip's only Irish language school), 2 doctors surgeries, 7 residential estates (with in excess of 900 houses) and circa 60 individual detached residences. Celbridge Road is almost a village unto itself.

There are currently circa 560 housing units planned for WONDERFUL BARN. If CELBRIDGE ROAD EAST proceeds then Celbridge Road will need to cope with an increase of traffic in the region of 60% to 80%. The LAP only offers definitive plans to enable easy access for Residents from WONDERFUL BARN accessing the Celbridge Road. There are no plans or objectives proposed to improve the future access issues of the other residents along its length. By proceeding with rezoning CELBRIDGE ROAD EAST both the current residents of Leixlip and the new residents of CELBRIDGE ROAD EAST will be negatively impacted.

The existing congestion at the intersection of the Celbridge Road (R404)/ Main St (R148) is an area of concern for residents along the Celbridge Road (R404). Through the insertion of objective MT03.3 (iv) the revised LAP has acknowledged that there is an existing issue with this intersection. While it is uncertain whether any Transport Assessment of the area has been conducted to date given no proposal to resolve the congestion has been noted it could be presumed that the Transport Assessment remains outstanding. This is of great concern to existing residents given the issue will be further compounded with the introduction of additional residents along this relatively small stretch of road.

c) Community/Recreational facilities

There has been no significant additions to the facilities for the residents of Leixlip since the expansion of Leixlip in the early 2000's when a number of estates were built along the Green Lane (Glen Easton, Beech Park, Rinawade, Ashbrook, etc.). The recreational facilities, which are quite limited and located at the Leixlip Amenities Centre, include:

- one small playground located beside the Amenities Centre which contains circa 10 items for children to play with and is approximately 30% the size of the one located in Maynooth, a town with significantly lower population than Leixlip. The LAP has no objective listed to build another playground although it is mentioned in passing along with a skate park; and
- group/ team activities including basketball, soccer, running, tennis etc. The existing restrictions on membership (cost, ratio of coaches, fire regulations on occupancy etc) will mean that these facilities may not be accessible to a significant portion of the increased population.

It will take circa 20/25 minutes for a new resident in CELBRIDGE ROAD EAST to access the facilities located at the Amenities Centre by foot.

Leixlip was promised a swimming pool as part of a number of historic LAP's. To date the people remain disappointed as this promise was never fulfilled. There is a strong feeling among residents that any 'promises' for Community improvements by KCC (playground/Skate park) will not be actioned.

Recent developments at St Catherine Park are expected to dramatically reduce the amount of available parkland. The position is worsened further by the Development of WONDERFUL BARN which will dramatically reduce the parkland available to the residents of the Celbridge Road. In light of this it may be more beneficial to the Leixlip community that CELBRIDGE ROAD EAST be available as parkland.

2) Reversals by KCC on policies contained within the LAP

The LAP has 2 sections devoted to retention of Heritage and the Environment - one deals with Build Heritage and the other with Natural Heritage. Both sections argue :

- for the retention and improvement of sites within the confines of Leixlip, where possible; and
- that where development will take place these development's will augment rather than eliminate these areas.

The proposed development of CELBRIDGE ROAD EAST will not be a boon to the town as regards to its availability of green areas, its wildlife (flora and fauna) protection and retention or its historical architectural preservation. It is difficult to see how the development at CELBRIDGE ROAD EAST will retain or even augment any of the existing features surrounding it given:

- to access the CELBRIDGE ROAD EAST site by foot or by car it will require that a centuries old wall will have large sections of it destroyed to allow passage;
- hedgerows and trees at these entrance points will be removed to allow entrance and to improve visibility for cars entering /leaving due to the poor location of the site in relation to the flyover for the adjacent motorway;
- 3-4 long hedgerows located on the CELBRIDGE ROAD EAST site itself will have to be destroyed/removed as part of any development. Interspersed through and around these hedgerows are a large number of mature trees which will need to be cut down; and
- the construction of 2/ 3 story residential units on the elevated piece of land which is CELBRIDGE ROAD EAST will certainly impact the view from Leixlip Castle. Leixlip Castle has stood on its spot since 1172ad and is surrounded on all sides by large mature trees protecting its sightlines from being marred by building structures around it. This has been successful to date as all the current structures are built at the same ground level as the castle itself. The trees that surround it will only hide the proposed development when they still have their foliage.

3) Site specific issues with Housing unit construction at CELBRIDGE ROAD EAST

Residents have voiced a number of issues/ concerns regarding the proposal to build residential units on CELBRIDGE ROAD EAST. Their concerns include privacy, loss of natural light, drainage/ flooding risk and noise pollution:

a) *Privacy*

The residential developments at Leixlip Park, Wogansfield, Highfield Park and the other detached homes along that side of the Celbridge Road were built on a similar level to the existing Leixlip Demesne boundary wall. The wall itself was hand made from rough-hewn rock so its height is not uniform but it averages at about 6-7 feet high. The land at CELBRIDGE ROAD EAST was radically altered during the construction of the M4 motorway and now stands at 3 feet to 5 feet higher in places. This raises privacy concerns among residents. While the loss of some level of privacy is accepted such a large disparity between ground level heights will mean that an average sized person standing on the land in CELBRIDGE ROAD EAST will be at an eye-level with the bedroom windows of the adjacent estates and homes. This level of intrusion is unacceptable as most homes are only 20 to 30 feet away from CELBRIDGE ROAD EAST.

b) *Loss of natural light/Number of Units proposed*

The suggested construction of 2/3 storey residential units will result in the new units being an entire story higher when compared with the adjacent estates. It is feared that these units may overshadow the existing estate blocking out a lot of natural light.

Also if 3 storey units are built, while this may be counted as a single 'unit' it will in fact be a townhouse configuration consisting of a single storey unit with a separate 2 storey unit built atop of it. This would thereby exacerbate footfall, traffic levels, wastewater, education/community facility issues discussed earlier. Also it would mean that the 30-35 unit levels would in fact be exceeded beyond the outline in the LAP.

c) *Drainage/flooding risk*

The additional height of the land in CELBRIDGE ROAD EAST may also result in drainage from the site naturally flowing downhill to the adjacent estates causing increased risks of minor flooding to those homes.

d) *Noise pollution*

Current residents, especially those with homes running along the boundary wall, can hear the motorway noises quite clearly as their homes are only 200-300 metres in places from the motorway. It is concerning that KCC envisage placing a large number of housing units in such close proximity to a major motorway. Studies have shown that increased traffic noise has a detrimental social impact to those people living there and since it has already been illustrated that community facilities in the area are neither close nor abundant children residing in CELBRIDGE ROAD EAST would spend much of their time playing close to the motorway noise and fumes which could only have an adverse influence on them.

The images below illustrate the existing height differences between Leixlip Park and CELBRIDGE ROAD EAST.



Image 1 Illustrates the significant height difference between the land at CELBRIDGE ROAD EAST (see traffic cone) and the ground level in the adjoining estate Leixlip Park. The traffic cone on CELBRIDGE ROAD EAST site is a metre above the man's (height 1.8m) head.



Image 2 Illustrates that the site level at the CELBRIDGE ROAD EAST site remains constant demonstrating that the height issue is not isolated to one spot.



Image 3 Illustrates the view from CELBRIDGE ROAD EAST into Leixlip Park and demonstrates the clear height disparity and privacy/security concerns of the residents of Leixlip Park.



Image 4 Was taken at the boundary Wall with Leixlip Park. The raised mound of earth in the background marks the edge of CELBRIDGE ROAD EAST, this mound acts as a partial Noise barrier to the Motorway just behind it. This image illustrates how narrow CELBRIDGE ROAD EAST is between boundary wall and motorway in sections, this will mean that the conceptual plan that was detailed in the LAP, to build units rising in height towards motorway, will not work in some sections. As to reduce avoid noise of motorway noise levels the units will need to be built right far closer to the on boundary with existing estates that intimated in the LAP.

4) Lack of planning

It is evident from our review of proposed LAP that a number of fundamental studies that could have positively contributed to the development of Leixlip in a sustainable and practical manner have yet to be completed. These studies would have identified a number of issues to the planners which they could have factored into their proposal. Instead the approach that has been taken is that the studies will only be commissioned once rezoning has been approved. This approach could result in future plans becoming Developer led with the concerns of Leixlip Residents regarding Heritage, Safety and the Environment becoming secondary to the Developer concerns of expediency and ease.

It is the opinion of this Residence Committee that this is in fact a haphazard and backwards approach to sustainable town planning and not in the best interests of the Leixlip community as a whole.

We would recommend that prior to reaching a decision of the rezoning of land for residential use, particularly in the case of CELBRIDGE ROAD EAST, the following assessments/ studies should be completed:

- a) a Traffic Impact Assessment should be completed along Celbridge Road taking into consideration the expected impact from the residential development of both WONDERFUL BARN (already zoned) and CELBRIDGE ROAD EAST (seeking rezoning). The figures utilised within the TIA should reference the higher population estimates as evidenced by the 2016 Census for potential residential uptake on both WONDERFUL BARN and CELBRIDGE ROAD EAST.
- b) An environmental study should be conducted on both the CELBRIDGE ROAD EAST site and the hedgerows and trees along Pound Street and the Celbridge Road that would be affected by any development at CELBRIDGE ROAD EAST. This study should include (but not be limited to) existing flora and fauna (wild pheasants for example inhabit the site), hunting patterns and zones for local predators (hawks, buzzards, foxes and owls have been evidenced on site), and bat activity.
- c) A Noise study as part of the wider Kildare County Council Noise Action Plan.
- d) Drainage and flood risk assessment.
A comprehensive and detailed approach to minimise the effects of the height disparity in the lands designated CELBRIDGE ROAD EAST in relation to the existing adjoining residential units and Leixlip Castle.

Recommendations coming for the above assessments/ studies should be factored into the rezoning application.

We note that the minimum requirement for a developments Open Space provision of 15% has been omitted from the latest version of the LAP. This should be included in the build form section of the LAP. While the boundary area (hedgerow, ditch and boundary wall) between the existing estates and CELBRIDGE ROAD EAST should be retained with a suitable barrier of open space this should be excluded from the 15% Open space provision as this type of land would be deemed unsuitable and unsafe for recreational purposes of residents.

The LAP should provide guidance to ensure:

- any further planning permission includes a comprehensive design in respect of the Demesnes boundary wall to ensure the residents of CELBRIDGE ROAD EAST are prevented from misusing or damaging the structure and to implement safety measures to prevent injury to younger residents from any development seeking to 'explore' the Demesnes boundary; and

- any potential damage to the Leixlip Castle grounds from the development of CELBRIDGE ROAD EAST is prevented from occurring without altering the current structural views from/to Leixlip Castle.