

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

1. 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 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 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.

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

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

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

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

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

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. In all instances once the developers get planning permission they will look to increase the densities to the max and therefore the total numbers are underestimated. In reality the combined new build will double the size of the residential areas in north Kildare. The numbers in the plan are very misleading in regard to the actual size of the development. The current situation at Wonderful barn is a live example of this type of developer opportunism.
9. 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 towns 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.
10. 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.
11. 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.
12. 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.
13. 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 neighbourhood centres, 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.

14. MT3.11 No Traffic Impact Assessments (TIA) has been completed for this KDA.
15. Protected structures, are part of this development with no plan as to how they will actually be protected.
16. The groundwater in this area described in the Lap as highly vulnerable with sections of extreme vulnerability. This plan requires a detailed underground and over ground site analysis. No detail is provided of what this analysis will entail, when it will be completed, who will undertake same, what level of expertise they will have and what will done with the findings. Groundwater in the this area is predominantly moderately vulnerable. The objective of the LAP is to encourage protecting these resources from further deterioration with no commitment to improvement works.
17. MT1.4 No ecological analysis has been completed on the effects of this proposal.
18. The Confey historical / future flooding risk has been clearly identified. The 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.
19. This KDA is facilitating large residential development of at least 1350 units for which there is little or no local demand.
20. The cost of the housing units in this development will make the vast majority of the properties on offer outside the reach of the local population.
21. The development 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.
22. 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 the Confey area.

23. This proposed development does not respect the setting of the subject lands both in terms of design and scale.
24. This proposed development opens up the possibility of further encroachment into the adjacent farmlands for future development.
25. 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.
26. The development will destroy a Strategic Open Space that forms part of the green corridor between Leixlip and Dunboyne.
27. This proposed development will destroy one of the most important or 'Key' Green Infrastructure areas (as well as their associated habitats) in our town.
28. 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.
29. The LAP provides no Road link to M4 or M3 and no plans in place to deliver same.
30. The combined additional traffic from this KDA and other KDAs will bring up to 5000 additional vehicles on to the local streets which are already experiencing traffic congestion at peak commute times and school start and finish times.
31. The development will have very negative impact on traffic flow through Main Street and all the local road network in the Confey area.
32. This development will cause massive increases in pollution and increased noise levels.
33. The development will destroy hedgerows, exiting trees and grasslands.

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 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.

36. The proposal will have negative impact on residents in River Forest, Glendale, Glendale Meadows, Newtown, Avondale, St Marys Park, Mill Lane and Ryelvale Lawns as they are exposed to through pedestrian and cycle traffic from this development which is being routed through their estates. This will completely alter the current environment in which residents have been living for many years and undermine their property values and way of life.

37. This development will have a very negative impact of the value of existing properties as it will offer new incentivized alternatives to persons looking to move into the town thereby undermining the value of existing secondhand homes which are subject to stamp duty.

38. Ministerial decision 6th Mar 2018 - "The revised Draft Leixlip Local Area Plan shall be published not later than 6 months following the issuing of a Direction." Provided more than a year later – Breach of timeframe so the council are in fact operating ultra vires.

39. 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.

40. Lands will be reserved for the provision of educational facilities, a new community hub to include a community building/civic space, car parking and an extended cemetery. No commitment to actually provide anything.
41. Previous experience tells us that the housing element which is developer funded will be constructed and the new community will then have to fight a rear guard action for decades to get the required infrastructure to match the needs. This is totally unacceptable.
42. 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 of this new neighbourhood in a coherent and sustainable manner is the timely delivery of critical supporting infrastructure. The plan without a guaranteed funding stream is unfortunately not a plan its simply a wish list.
43. The plan is "Encouraging a strong night time economy and presence of residents outside of work hours". Confey is a residential area that has very limited night time activity as residents generally wish to go to bed at night. Why do the planners think we need strong night time activity and residents on the streets at night. This is not Paris. Leixlip is a town that people live and work in and no demand is evident to turn it into the "Temple Bar" of Kildare with all its associated antisocial problems.
44. This plan does not Harmonise with or enhance the existing built and natural environment of Confey. The existing environment in this area is grassland and one-off houses. The required compulsory purchase of long term residents homes to facilitate the new street does not even warrant a mention and will be resisted strongly by both the individual families and residents generally.
45. The availability of trains, the capacity of the rolling stock , the frequency of the trains , the usage levels that are currently in play and are all matters that are straining the existing train service. People will only use trains if they are available, comfortable, on time, travelling to locations they wish to go, clean, have adequate seating, high quality WIFI, are priced competitively, within short walking distance of their homes and facilitated by adequate free parking. The current and proposed future situation at Confey ticks none of the boxes that will encourage and ensure high volume usage of the rail service.
46. The park and ride facility according to the LAP will be within the new development. This area will not be close enough to the train station to encourage use. To have a max 50 spaces is ridiculous and an area of at least 400 spaces would be required. Currently train users are parking outside peoples homes in Glendale from early morning until late evening.
47. The plan does not provide the conservation plans re Confey graveyard and archaeology sites of interest in the area.

48. The location, scale and identity of the Confey development lands within the framework are apparently to take into account the presence and proximity to the rail line and the future DART expansion programme. The mere proximity to rail line is no basis for anything. The plan is presuming that the future residents will predominately want to travel on the line. In reality the new residents will want to commute in a multidirectional radial route system which simply means the existing road infrastructure will be absolutely overloaded. The future expansion of the Dart will not be within the timeframe of the development plan and therefore no development should proceed until the completion of the upgraded service.
49. The plan is proposing building heights within the identified higher density lands shall generally provide for 3 to 4 storey buildings but with options to go up to 5 storeys. This scale and height is totally out of line with the character, current built and natural landscape.
50. 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.
51. The plan includes the removal of the sporting and social heart of our community Confey GAA. 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.
52. If any loss of our existing playing pitches is to take place the solution is surely to relocate the pitches to the field directly behind the club house described as residential area 5. This would retain the Club house etc in the existing location while freeing up the pitches if required for sensitive low rise housing and adequate park and ride at the western end of the site.
53. The plan suggests a minor extension to the south and west c. 1 acre of our existing cemetery. I submit this has no merit until the problem of flooding is rectified.
54. The plan includes a new Public park. A new park will be welcomed but we already have issues with the maintenance and upkeep of St. Catherine's Park. If we cannot get the issues resolved with our existing park after almost 20yrs where is funding for the upkeep of this new park.

55. 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. We need to provide realistic possibility of the next generation of Leixlip natives acquiring homes in our town. Building homes that are unaffordable will do nothing to help the younger residents of our town should they decide to put down roots in our town.
56. I submit that should any development go ahead no construction traffic is allowed use the Captains Hill.
57. In summary the requirement for Leixlip and Confey 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 far worse. Leixlip and Confey are beautiful places that are very sought after locations for people to live. It is critical that sympathetic and innovative planning takes place with adequate infrastructure provided to support same. The scale should match the communities 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.

To whom it may concern I wish to make the following submission in regard to the Draft LAP for Leixlip.

- 1) The policy is to provide a minimum 3315 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 demand to justify these decisions.
- 2) 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.
- 3) We should not be rezoning land that won't be developed within the lifecycle of this LAP.
- 4) The LAP fails to provide a Master Plan as directed by ministerial order.
- 5) 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.
- 6) 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.' In a complete "U" turn the LAP is now in fact proposing a road into the park to facilitate a major housing development at Black Avenue. This change is despite 1021 submissions in 2017 regarding protection of St Catherine's Park from road development. To totally ignore the people is dictatorial and undemocratic.
- 7) The Draft LAP makes no specific provision for
 - A swimming pool site.
 - A civil building with theatre or performance space.
 - Homes for the elderly/retired – 25% of Leixlip population 55+
 - Affordable homes.
 - Social housing.
 - A Sensory Garden.

- Charging points for electric vehicles.
- 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.

We have witnessed the power cuts, water leaks and ongoing stench in the middle of our town from the existing systems.

The Primary Care Centre - location in Collinstown is not suitable to stakeholders – young, old and infirm and without transport. A location central to the town and on a public transport route is critical

In addition, nothing included to deal with work that volunteers, residents associations, tidy towns and individuals are doing with little or no support from KCC.

8. 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.

9. The failure to deal with existing problems within the town and provide the required infrastructure upgrades in advance of any new development shows total lack of appreciation of the current problems the town faces and disregard for the people of Leixlip and for the problems that will be visited on any new residents moving into the new developments.

10. The plan does not adequately factor in the major expansion of Intel's impact on our existing transport infrastructure.

11. 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.

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12. In all instances once the developers get planning permission they will look to increase the densities to the max and therefore the total numbers are underestimated. In reality the combined new build will double the size of the residential areas in north Kildare. The numbers in the plan are very misleading in regard to the actual size of the development. The current situation at Wonderful barn and Westfield are live examples of this type of developer opportunism.

13. This proposed 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 supply which is aging and faulty are unable to support developments of this scale. The towns 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.

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15. MT1.4 No ecological analysis has been completed on the effects of this LAP.

16. The towns historical / future flooding risks have been clearly identified. The 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.

17. The proposed expansion of housing in particular is completely out of line with the actual local demand.

18. The cost of the housing units in this LAP will make the vast majority of the properties on offer outside the reach of the local population.

19. The 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.

20. This proposed 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.

21. This proposed LAP does not respect the setting of the subject lands both in terms of design and scale.

22. This proposed LAP opens up the possibility of further encroachment into the adjacent farmlands, parks and private estates for future development.

23. This proposed 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.

24. The LAP will destroy a Strategic Open Spaces that forms part of the green corridors in Leixlip and the surrounding area.

25. This proposed LAP will destroy 'Key' Green Infrastructure areas (as well as their associated habitats) in our town.

26. 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.

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

28. The combined additional traffic from this LAP will bring up to 5000 additional vehicles on to the local streets which are already experiencing traffic congestion at peak commute times and school start and finish times.

29. The LAP will have very negative impact on traffic flow through Main Street and all the local road network in the Leixlip area.

30. This LAP will cause massive increases in pollution and increased noise levels in our town.

31. 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.

32. The LAP proposes pedestrian/cycle routes through out 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 behaviors and easier entrance and exit for criminals to the existing residential areas bordering the proposed new development areas.

33. The LAP will have negative impact on residents in existing estates as they are exposed to through pedestrian and cycle traffic from new developments which is being routed through their estates. This will completely alter the current environment in which residents have been living for many years and undermine their property values and way of life.

34. This LAP will have a very negative impact of the value of existing properties as it will offer new incentivized alternatives to persons looking to move into the town thereby undermining the value of existing secondhand homes which are subject to stamp duty.

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40. The LAP is "Encouraging a strong night time economy and presence of residents outside of work hours". Leixlip is a residential area that has very limited night time activity outside of the main street. Residents generally wish to go to bed at night. Why do the planners think we need strong night time activity and residents on the streets at night. This is not Paris. Leixlip is a town that people

live and work in and no demand is evident to turn it into the "Temple Bar" of Kildare with all its associated antisocial problems.

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

42. The required compulsory purchase of long term residents homes to facilitate the new street does not even warrant a mention and will be resisted strongly by both the individual families and residents generally.

43. The availability of trains, the capacity of the rolling stock , the frequency of the trains , the usage levels that are currently in play and are all matters that are straining the existing train service. People will only use trains if they are available, comfortable, on time, travelling to locations they wish to go, clean, have adequate seating, high quality WIFI, are priced competitively, within short walking distance of their homes and facilitated by adequate free parking. The current and proposed future situation meets none of the criteria that will encourage and ensure high volume usage of the rail service.

44. The park and ride facility will not be close enough to the train station to encourage use particularly during inclement weather. To have a max 50 spaces is ridiculous and an area of at least 400 spaces would be required. Currently train users are parking outside peoples homes in Glendale and other adjacent estates from early morning until late evening. which is the source of ongoing inconvenience to the residents.

45. The plan does not provide the conservation plans for archaeology sites of interest in the town.

46. The future expansion of the Dart will not be within the timeframe 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.

47. The 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.

48. 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. 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.

49. Some elements in the Leixlip Local Area Plan are regarded to give rise to adverse effects on the integrity of European Sites.

50. The LAP suggests a minor extension to the south and west c. 1 acre of our existing cemetery. I submit this has no merit until the problem of flooding is rectified.

51. The LAP includes new public parks. This could be welcomed but we already have issues with the maintenance and upkeep of St. Catherine's Park. These issues are unresolved with after 20yrs where is funding for the upkeep of these new parks.

52. 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

53. 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

54. The back land 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.

55. The provisions for childcare are totally unsatisfactory for either the current of future population of the town.

56. Future present and 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. We need to provide realistic possibility of the next generation of Leixlip natives acquiring homes in our town. Building homes that are unaffordable will do nothing to help the younger residents of this area should they decide to put down roots in our town.

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

58. 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. Leixlip is a beautiful place that is very sought after as a location for people to live. 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.