

To whom it may concern I wish to make the following submission in regard to the proposed BLACK AVENUE KEY DEVELOPMENT AREA (KDA)

1. The council should reinstate the 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 council is now in fact proposing a road into the park to facilitate a major housing development at Black Avenue. In 2017 - 1021 submissions regarding protection of St. Catherine's Park from road development.
2. This Key Development Area was removed from the last Local Area Plan by unanimously backed Material Alterations.
3. 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 infrastructure 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 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.
4. 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; "
5. This proposed development is contrary to MT3.8 "To ensure that any significant new development takes place in proximity to public transport routes and can be adequately served by the road network." The Black avenue proposal has no public transport route and no road network.
6. MT3.11 No Traffic Impact Assessments (TIA) has been included for this KDA
7. The groundwater in this area described in the Lap as highly vulnerable with sections of extreme vulnerability.
8. MT1.4 No ecological analysis has been completed on the effects of this proposal.
9. No commitment to on-site flood risk analysis.
10. This KDA is facilitating large residential development of at least 350 units for which there is no demand.
11. 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 environment of St Catherine's Park.

12. This proposed development is inside the environment of an existing park and can have no positive impact on the park.
13. The proposal provides a significant negative impact on a green and safe access for pedestrian and cyclists using St. Catherine's Park through increased traffic volumes.
14. The existing car park facilities will be reduced as the proposed egress route is via the car park for vehicular traffic from the development.
15. This proposed development does not respect the setting of the subject lands and or the adjoining parklands.
16. This proposed development opens up the possibility of further encroachment into the existing park for future development.
17. 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**.
18. The development will destroy a Strategic Open Space which is right in the middle of proposed Black Avenue housing development in St Catherine's.
19. This proposed development will destroy areas of St. Catherine's Park which is considered to be one of the most important or 'Key' Green Infrastructure areas (as well as their associated habitats) in our town.
20. No new linear park is being provided along Black Avenue. The existing linear park which starts at the entrance from the Mill Lane is in affect being reduced and many of its original features – trees, hedgerows and grasslands being removed contrary to the council's own policies.
21. Connectivity via Mill Lane to R148 will be a nightmare for residents due to increased traffic volume, sightlines, narrow road, poor pedestrian walkways and traffic delays.
22. The development will have very negative impact on traffic flow through Main Street.
23. The existing residents Health and Safety is being put at risk due to the traffic implications to response times from Emergency services i.e. Fire Brigade. which is located in Mill Lane.
24. The egress route from this development is through the car park in St. Catherine's Park which opens the park to 24/7 vehicular traffic.
25. This proposal will result in the loss of biodiversity through the destruction of woodlands at hill area of the Black Avenue as the roadway will need to widen to allow two-way traffic.
26. This development will cause massive increases in pollution, increased noise levels, and illegal dumping.
27. The development will destroy hedgerows, exiting trees and parklands with five additional pedestrian entrances being created to the park and Glendale meadows.

28. The development includes the creation of two pedestrian access routes into existing cul de sacs at Glendale Meadows that will completely alter the current environment in which residents have been living for many years and undermine their property values and way of life.
29. The development facilitates anti-social behaviors and easier entrance and exit for criminals to the existing residential areas bordering the area.
30. The proposal has been rejected previously by the council and is simply included to facilitate a private landowner who has landlocked grassland to convert same into a massive financial profit.
31. 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.

To whom it may concern I wish to make the following submission with 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 is 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.

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

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

**Currently using Bus/Rail****Projected to use Bus/Rail**

<b>Leixlip</b>	<b>1489</b>	<b>2321 (+ 55%)</b>
Celbridge	1457	2071 (+ 42%)
Maynooth	1291	1676 (+ 30%)
<b>Total</b>	<b>4237</b>	<b>6068 (+1831) +43%</b>

**Projected increase in Commuters using Road network (not Buses) for work****Currently using Roads****Projected to use Roads**

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

The Draft Plan does not reflect or acknowledge the complexity of towns the size of Celbridge, Maynooth and Leixlip lying in such close proximity to each other and sharing the same road networks and Public transport facilities. Any development of Celbridge and Maynooth has a negative knock on impact on Leixlip as our road, bus and rail infrastructure as designed results in passengers and motorists being already in the system before the vehicles reach or pass through our town. The ability of Leixlip residents to access the N4, bus and rail system is already affected by the scale of the exiting populations in Celbridge and Maynooth without any further development of these towns.

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.

14. 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.
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.
35. Ministerial decision 6<sup>th</sup> 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.
36. 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.
37. Lands will be reserved for the provision of various facilities with no commitment to actually provide anything.
38. 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.
39. 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 in a coherent and sustainable manner is the timely delivery of critical supporting infrastructure. The LAP without a guaranteed funding stream is unfortunately not a plan that can deliver this infrastructure, its simply a wish list.
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. 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 after 20 years - 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 town's 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 or 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 provides 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 its 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's 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.