

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. Unanimously backed Material Alterations removed this Key Development Area from the last Local Area Plan.
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 town's 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 neighborhood centers**, 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 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 carpark 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, existing 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 on two previous occasions 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.