

The Planning Department
Kildare County Council
Áras Chill Dara
Devoy Park,
Naas,
Ci. Kildare.

11 July 2019

Re: Draft Leixlip Local Area Plan 2020-2026

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Dear Sir/Madam,

1.0 Introduction

Future Analytics Consulting Limited (FAC), 23 Fitzwilliam Square (South), Dublin 2 – on behalf of Thomas Leonard, [REDACTED] – wishes to provide a submission in relation to the Draft Leixlip Local Area Plan (LAP). Specifically, this submission relates to Appendix A of the LAP, the Urban Design Framework for Confey (UDF) and the subject landholding at Moortown, Confey, Leixlip, Co. Kildare.

Mr. Leonard welcomes the publication of the Draft LAP by Kildare County Council and the opportunity to make a submission. Mr. Leonard supports a planned and evidence-based approach to development and is pleased to actively engage with the County Council in this regard.

This submission outlines the planning rationale for the adjustment of the boundaries of the UDF for Confey to include the subject lands under the ownership of Mr. Leonard, which immediately abut the boundary as currently proposed. The incorporation of these lands within the UDF and their zoning under the land use plan for Confey is envisaged. This submission sets out the rationale for the inclusion of the subject site within the UDF boundary and its zoning for residential land use by outlining the subject sites long-term development potential, and the opportunity presented to support the UDF, Leixlip LAP and wider national planning policy. The submission provides three points supporting the adjustment of the UDF boundary to include the subject site, and two points which provide justification for the subject sites zoning for residential land use.

2.0 Subject Site

2.1 Site Context

The subject site at Moortown, Confey, Leixlip, Co. Kildare measures approx. 22ha and is located to the northwest of Confey, approx. 860m from the Leixlip-Confey Train Station and 1.5km to the north of Leixlip village. It is a greenfield site surrounded on each side by agricultural lands. The south-east corner of the site abuts the development boundary shown in the Draft UDF for Confey.

The wider surrounding to the area to the south and west is marked by residential development. It is 500m to the north of the Royal Canal Greenway, and within approx. 900m of the River Forest residential area and Confey Community College. As per Figure 1 the southern boundary of the site faces onto the L1015, which connects off the R149 to the east at Confey and runs through the rural lands to the west of the subject site. These lands to the west have seen ribbon development in recent years, with a number of one-off houses facing onto the L1015. By way of its proximity to the R149 and the associated regional road network the subject site enjoys accessibility to Leixlip and the Collinstown Industrial Park, as well as Maynooth further to the west.



Figure 1 Site location

2.2 Strategic Policy Context

Leixlip is located approx. 15km to the west of the built-up area of Dublin, but within the Dublin Metropolitan Area as identified in the Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES). The RSES aims to achieve the compact development targets of situating at least 50% of all new homes within or contiguous to the existing built up area in Dublin, and 30% in other suitable settlements. The Metropolitan Area Strategic Plan contained within the RSES identifies strategic development corridors which are suitable for targeted compact development. As per Figure 2 Leixlip is situated within the North-West Strategic

Development Corridor, which has been assigned a total long-term population target of 37,000 up to 2031 (Table 1). Leixlip is noted as a key area for residential and employment development within this corridor.

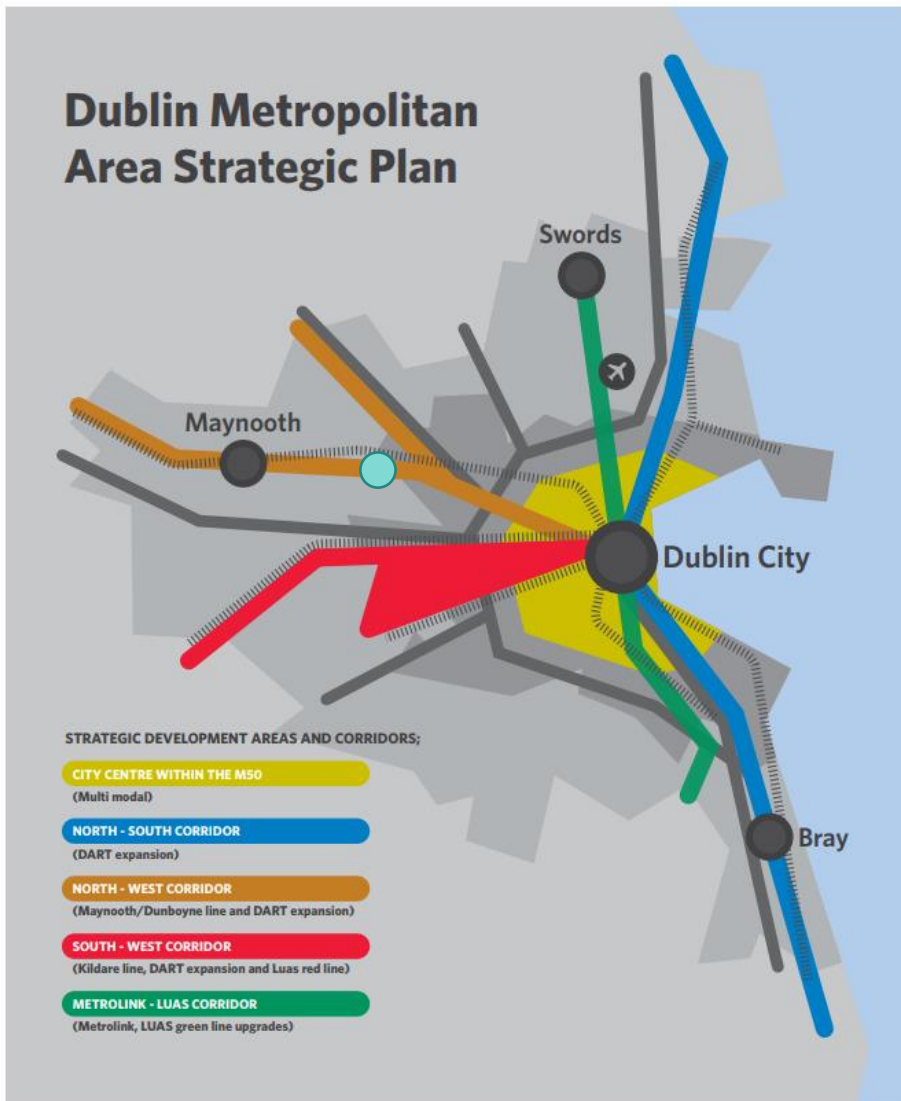


Figure 2 Dublin Metropolitan Area Strategic Plan from the RSES (blue dot represents approximate location of Leixlip).

Table 1 Capacity Infrastructure and Phasing Development for Leixlip.

| North-West Corridor | Residential | Employment/Mixed Use | Phasing/Enabling infrastructure |
|---|--|--|--|
| Population Capacity Short 24,000 + Medium 10,000 +Long 3,000 = Total 37,000 | Leixlip- strategic greenfield lands near Confey station with capacity for phased development, improve links to Leixlip and adjoining Dublin/Meath lands | Large scale former Hewlett Packard site and Collinstown site to strengthen employment base for North Kildare | Short to Medium term LUAS extension to Maynooth, roads upgrades, community and social infrastructure, waste water and local water network upgrades |

3.0 Grounds of Submission

3.1 The boundary of the UDF as currently proposed does not reflect the larger pre-existing pattern of development at Leixlip

A National Strategic Outcome under the National Planning Framework is Compact Growth. It is recognised that carefully managing the sustainable growth of compact cities, towns and villages will require the consolidation of development within the footprint of pre-existing urban settlements. This is supported by national policy:

NPO 3a: *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

NPO3c: *Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.*

This focus on compact growth is echoed by the RSES for the Eastern and Midland Region, which provides the following Guiding Principle for the development of the Dublin Metropolitan Area:

Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target to 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.

In providing for compact brownfield and infill development it is recognised that residential development will still have to be delivered on suitable greenfield sites, with the RSES allowing for the delivery of up to 70% of new homes outside the built-up area of settlements outside of Dublin. The delivery of greenfield development outside of Leixlip's existing built up area presents an opportunity to reflect Leixlip's larger pattern of development and consolidate the extent of its urban form.

As per Figure 3 the existing built up area of Leixlip is predominantly located south of the Royal Canal Greenway. The construction of the Collinstown Industrial Park on the opposite side of the Royal Canal has seen this pattern of development extend northwest. The proposed development of a new neighbourhood at Confey presents an opportunity to consolidate this emerging pattern of development, and provide for Leixlip's compact growth in an ordered circumference with the Royal Canal at its centre.



Figure 3 Leixlip and surrounding area (subject site outlined in red and boundary of the draft Confey UDF area outlined in blue).

However, the current boundaries of the UDF do not reflect this existing pattern of development and fail to capitalise on the opportunity for Leixlip’s compact growth. As proposed their extent leaves a large section of unplanned land along the north side of the Royal Canal between the Confey Strategic Growth Area and the Collinstown Industrial Park. This is apparent in the Core Strategy Concept Map contained within the Draft Leixlip LAP (Figure 4).

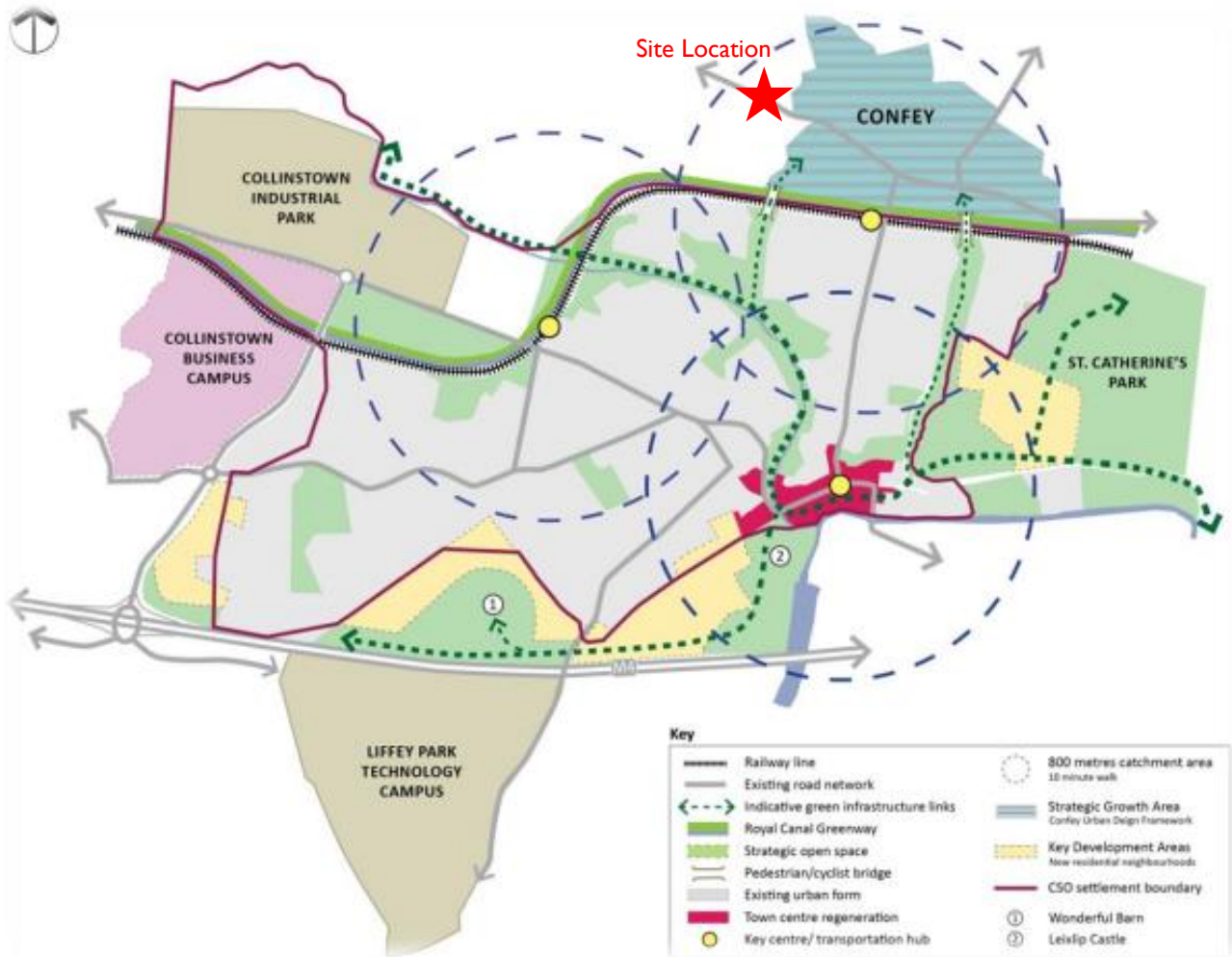


Figure 4 Core Strategy Concept Map from the Draft Leixlip LAP.

The council are urged to reconsider the extent of the UDF's boundaries and the location of residentially zoned lands in order to provide for targeted development that more closely aligns within Leixlip's larger urban footprint. As per Figure 4 below the proposed R6 lands under the UDF are bordered by open space and agricultural fields, and are located on Leixlip's eastern periphery. The provision of residential development on this periphery is contrary to national and regional targets for compact growth. It is submitted that the residential zoning for these lands be redistributed to the west of Confey, in closer proximity to existing facilities and opportunities within Leixlip. This would help address the quantum of unplanned land between Confey and the Collinstown Industrial Park, and consolidate Leixlip's compact urban form as is consistent with national and regional policy.

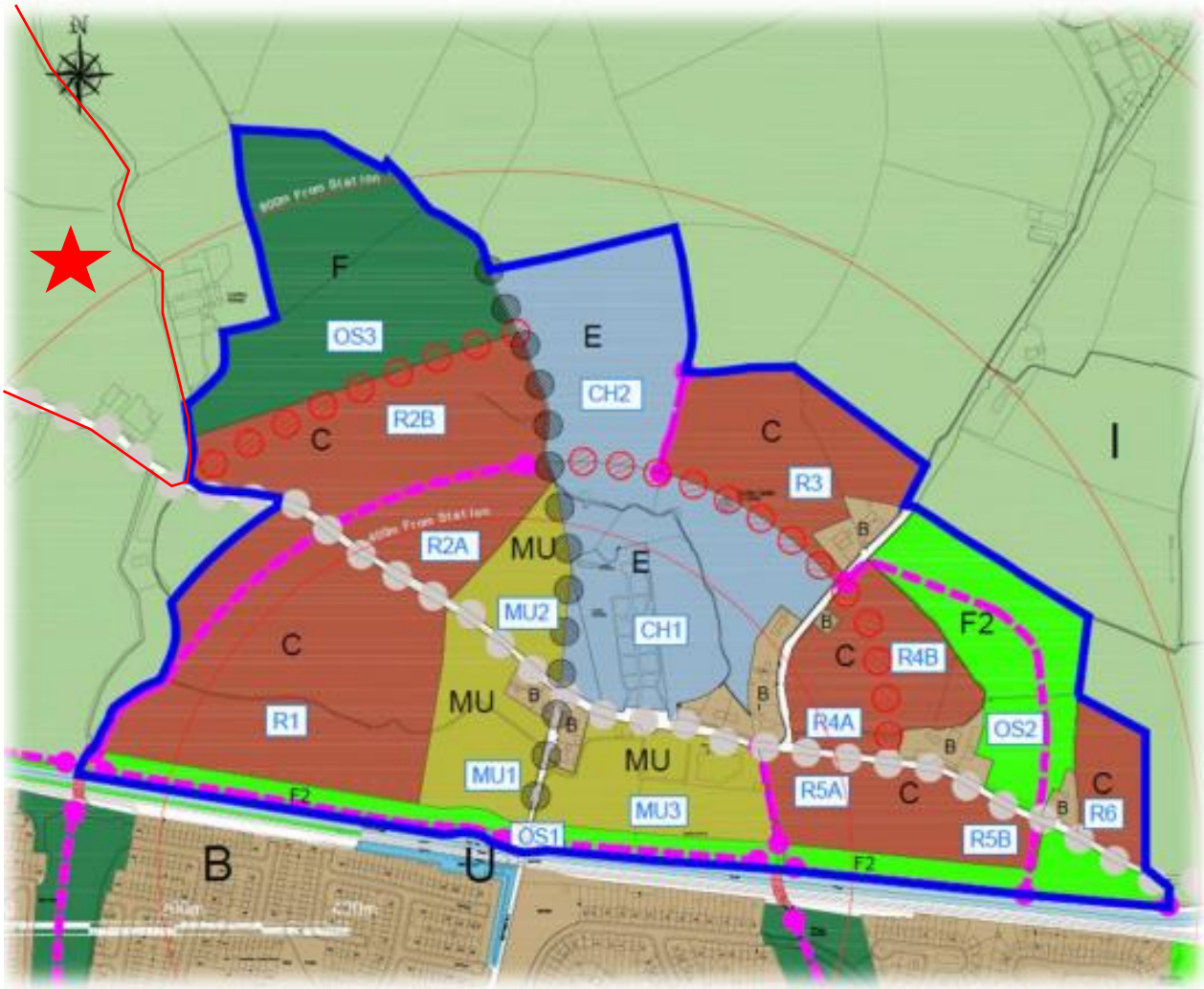


Figure 5 Draft Land Use Zoning Map and Character Areas from the Draft UDF for Confey (with subject site outlined).

3.2 The extension of the UDF boundary will allow for increased pedestrian connectivity and permeability between Confey and the Royal Canal Greenway, as provided for under the Draft LAP and the Confey UDF

The UDF for Confey is predicated on a number of noted Design Principles, which include:

- *“To maximise the potential for a sustainable walk/cycle environment, connecting the area to Main Street to the south, employment opportunities to the west and existing parklands to the south east.*
- *To create a neighborhood that is highly permeable and accessible and links attractive streets, squares, open spaces and parks.*
- *To promote walking and cycling over car travel through proximity to local facilities and by the provision of a carefully planned high quality network of footpaths and cycle paths.*
- *To fully realise the potential of the Royal Canal Greenway as an axis for internal trip movements within the new neighborhood and to the existing built-up area of Leixlip and beyond.”*

The centrality of the Royal Canal Greenway in achieving connectivity between the new neighbourhood at Confey and the existing built-up area of Leixlip to the south is supported by Policy MT1.5 of the Draft LAP:

“To facilitate the development of new pedestrian/cycle links across the canal and railway that enhance walking and cycling options and connect the new neighbourhood at Confey and the Royal Canal Greenway to existing residential areas, public spaces, Confey Station and facilities within Leixlip.”

Relevant upgrades provided for under the Movement and Access Strategy for Confey include two new pedestrian/cycle bridges across the Royal Canal between Confey and Newtown. These are situated at the east at Glendale Meadows and at the west at Riverforest Park, and their routes will extend to form a dedication pedestrian/cycle connection along an approx.400m circumference from Confey Railway Station.



Figure 6 Movement and Access Strategy provided Draft Confey UDF.

Mr. Leonard fully supports the principle of pedestrian connectivity within the new neighbourhood at Confey and between Confey and the built-up area of Leixlip to the south. However, it is respectfully submitted that the layout of these new pedestrian routes as currently proposed fails to provide for connectivity with the existing south-west area of Leixlip. The proposed western pedestrian bridge is situated on a small bank of open space within the centre of the larger River Forest development. The location of this bridge and its extended route effectively severs this development in two and cuts off Confey from Confey Community College, Louisa Valley to the south and the Collinstwon Industrial Park to the west. As such the proposed upgrades fail to capitalise on the opportunity to provide for a pedestrian route between Confey and existing education and employment opportunities within Leixlip. It is proposed that the boundary of the UDF be extended further west along the Royal Canal Greenway to incorporate these lands and provide for further pedestrian connectivity, as is consistent with the principles of the policies of the Draft UDF and Draft LAP.

3.3 The distribution of residentially zoned lands under the UDF does not account for available flood risk data

It is submitted that residentially zoned lands to the east of Confey are located adjacent to a flood risk zone, and so are unsuitable for residential development. According to available information provided by the OPW the OS2 area of proposed open space presents a current and future flood risk. Sections of this open space that are bordered by the R4, R5 and R6 residential character areas present an Annual Exceedance Probability (AEP) of 1% in the present day, and an AEP of 10% according to Mid-Range Future Scenarios. This represents a 1 in 10 chance of a flood event occurring in any given year in the future. As such residential development of these lands would pose an unacceptable risk to the amenity and safety of potential future residents.

As per Figure 7 below lands to the west of Confey pose a close-to-nil chance of suffering from flood impacts, with some minor areas within the subject site present a probability of flood risk. These are limited to the linear route of the small tributary that flows across the Royal Canal from the River Forest area. As such the subject site is considered to constitute a sensible and viable alternative for residential development as compared with the R6 area to the west of Confey.



Figure 7 Indicative flood risk zones for Confey (flood maps taken from the OPW's National Flood Hazard Mapping Website (subject site highlighted in red).

3.4 The development potential of the subject site will be unlocked by the road works proposed under the Movement and Access Strategy for the Confey Urban Design Framework

The Movement and Access Strategy for Confey aims to “create a neighbourhood which maximises the use of sustainable modes of transport.” It provides for several upgrades to Confey’s existing road network and its connections with Leixlip. These include upgrades to the L1015, the creation of a new arterial route extending north from Leixlip-Confey Station and a new link route to the north-west that will connect the L1015 to this new arterial route.



Figure 8 Movement and Access Strategy provided Draft UDF for Confey (subject site outlined in blue).

As per Figure x the subject site is situated on the L1015 and abuts the intersection of the L1015 and the proposed north-west link road. These road works will provide for increased accessibility between the subject site and Confey Station and the proposed Community Hub Character in the centre of Confey, as well as to existing facilities and employment opportunities to the south and west at Leixlip and Collinstown Industrial Park. As such the extension of residentially zoned lands westwards will provide for the efficient use of the improved road network, and would support sustainable travel and commuting patterns within Confey and the wider Leixlip area.

3.5 The subject site is within 1km of a commuter rail station

The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas advocate for sustainable settlement patterns that maximise the efficient use of public transport services, and prescribe minimum net residential densities of 50 dwellings per hectare for sites within 1km walking distance of rail stations. The Draft UDF prescribes a scale and density of development within Confey based on the proximity of the Confey Rail Station, and sets out areas suitable for high and medium density development, located

within 400m and 800m of the rail station. The southern portion of the subject site is located in this Medium Density area within 800m of the Confey Rail Station, and the majority of the subject lands are located with 1km of this commuter rail station. It is submitted that, with regard to the subject sites proximity to the Confey Railway Station and national guidance for sustainable residential development, the subject sites potential for residential development be recognised under the UDF and reflected in its zoning.

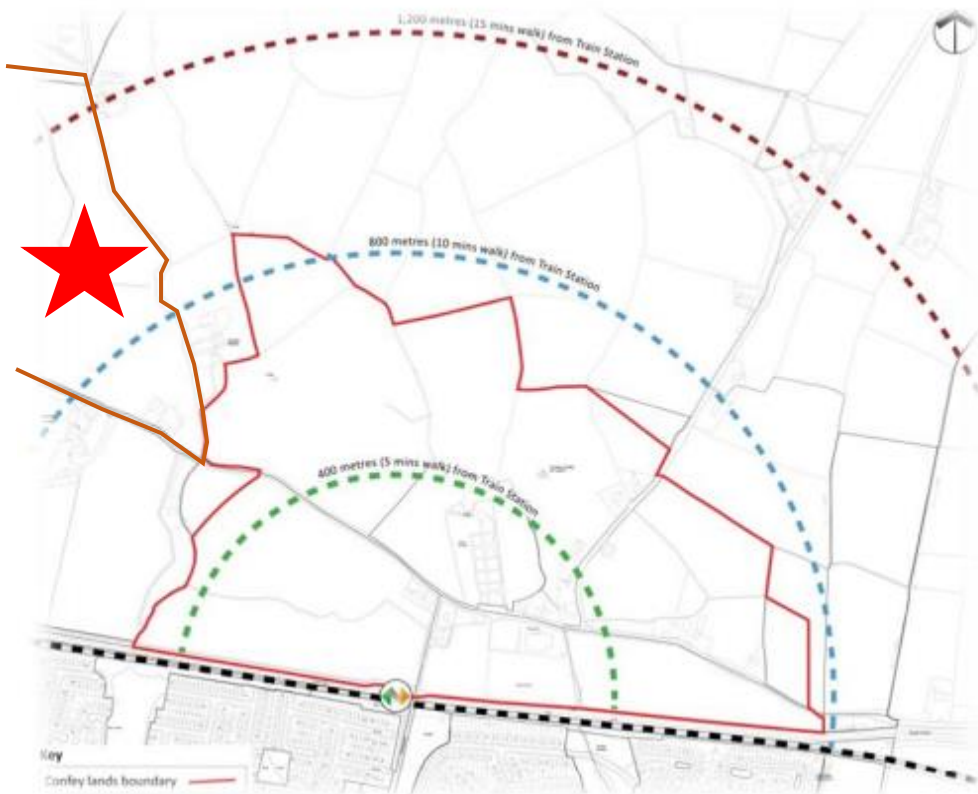


Figure 9 Indicative density and building heights from the Draft Confey Urban Design Framework (with subject site outlined).

Figure 10 and Figure 11 indicate the redistribution of residentially zoned lands from the east of the UDF area to the west within the subject site in terms of the draft land use zoning map contained within the draft UDF. Included as an appendices is the land use zoning map for the wider Leixlip area as provided for under the Draft LAP with indicative residential zoning of the subject site.

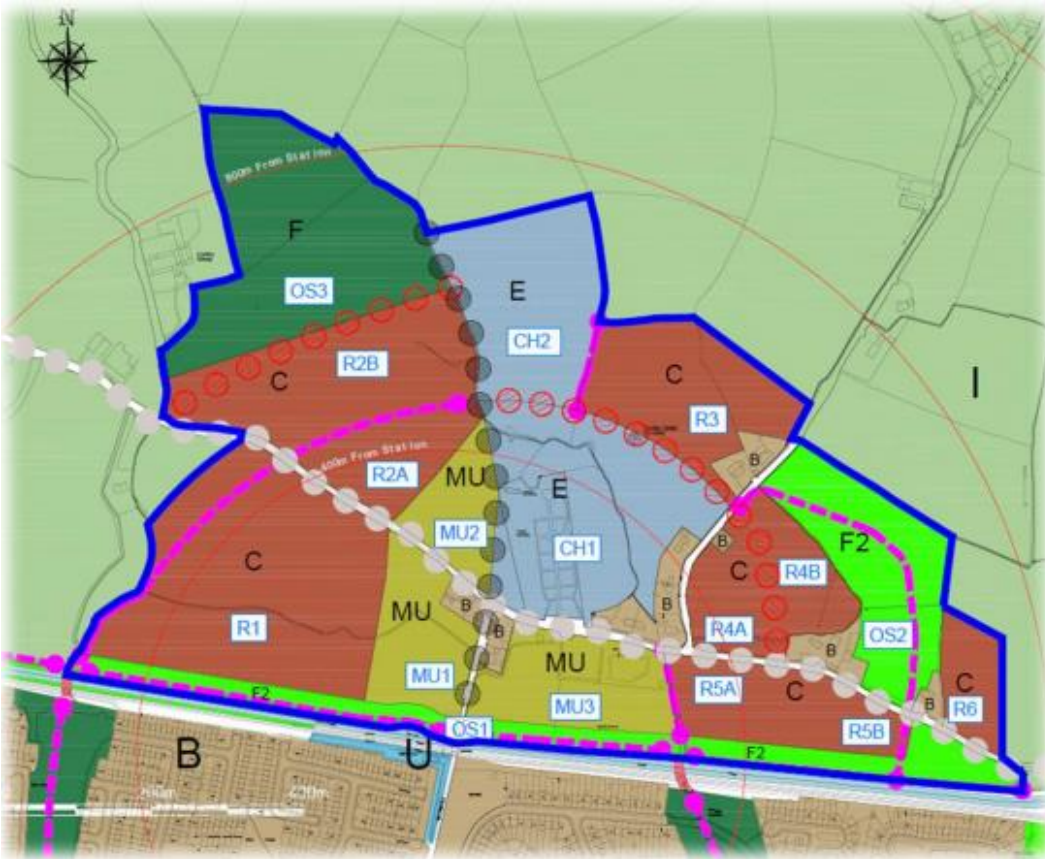


Figure 10 Draft Land Use Zoning Map and Character Areas from the Draft UDF for Confey (with subject site outlined).

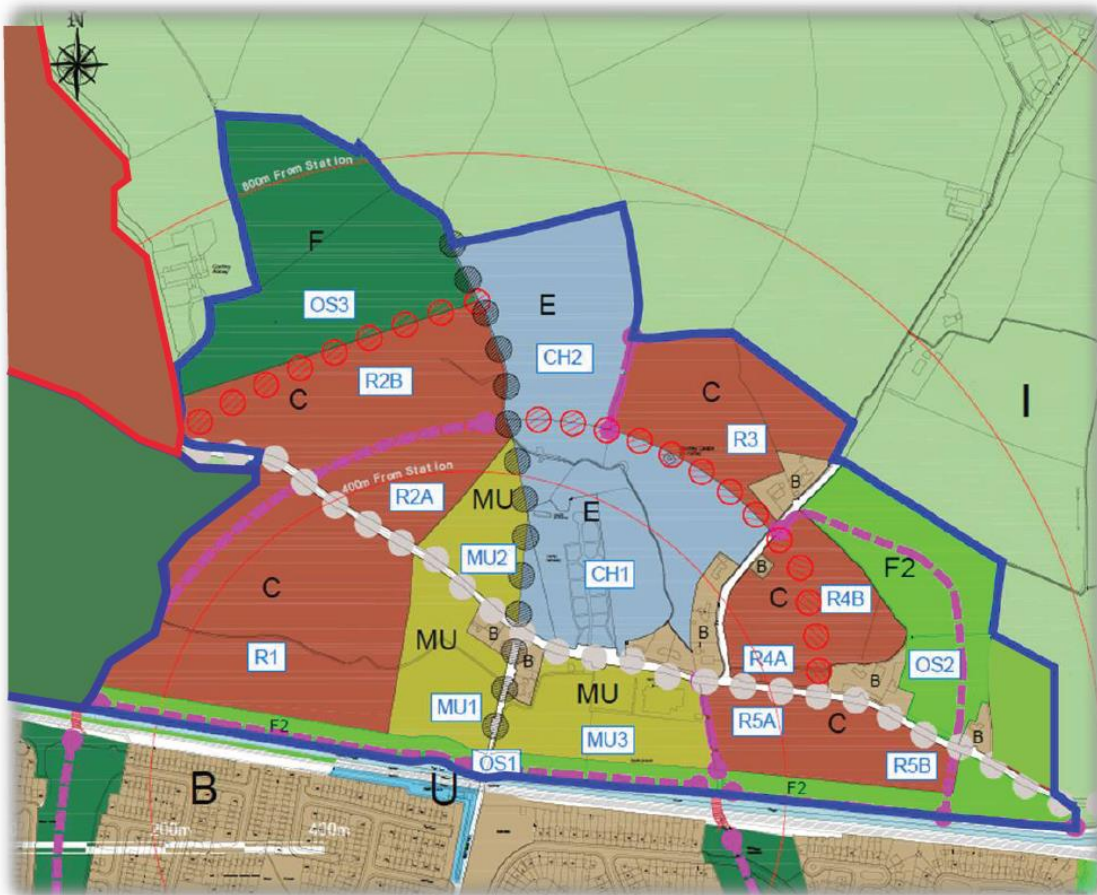


Figure 11 Draft Land Use Zoning Map incorporating residential zoning of subject site.

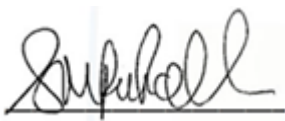
4.0 Conclusion

Mr. Leonard, the owner of the subject, welcomes the opportunity to engage with Kildare County Council on the delivery of a Local Area Plan for Leixlip and an Urban Design Framework for Confey. Mr. Leonard is eager to ensure that the forthcoming LAP and UDF have due regard for the value of expanding the boundary of the Confey UDF area to include the subject site and its appropriate zoning. This submission has sought to highlight the value of expanding the boundary of the UDF westwards in terms of increased connectivity with existing facilities and services in Leixlip, and the sustainable consolidation of larger development patterns for Leixlip's built up area. It has also provided a policy and evidence-based justification for the redistribution of the quantum of residentially zoned lands under the draft UDF the zoning of the subject site for residential land use.

Mr. Leonard together within Future Analytics Consulting, welcome the opportunity to engage further with Kildare County Council in delivering a high-quality Local Area Plan for Leixlip and evidence-based Urban Design Framework for Confey.

We trust the above is in order and look forward to acknowledgment of receipt of this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stephen Purcell', written over a horizontal line.

Stephen Purcell BSc. (Hons) MRUP PG DIP IS MIPI FSCSI FRICS
Director
Future Analytics Consulting Ltd.

Appendices

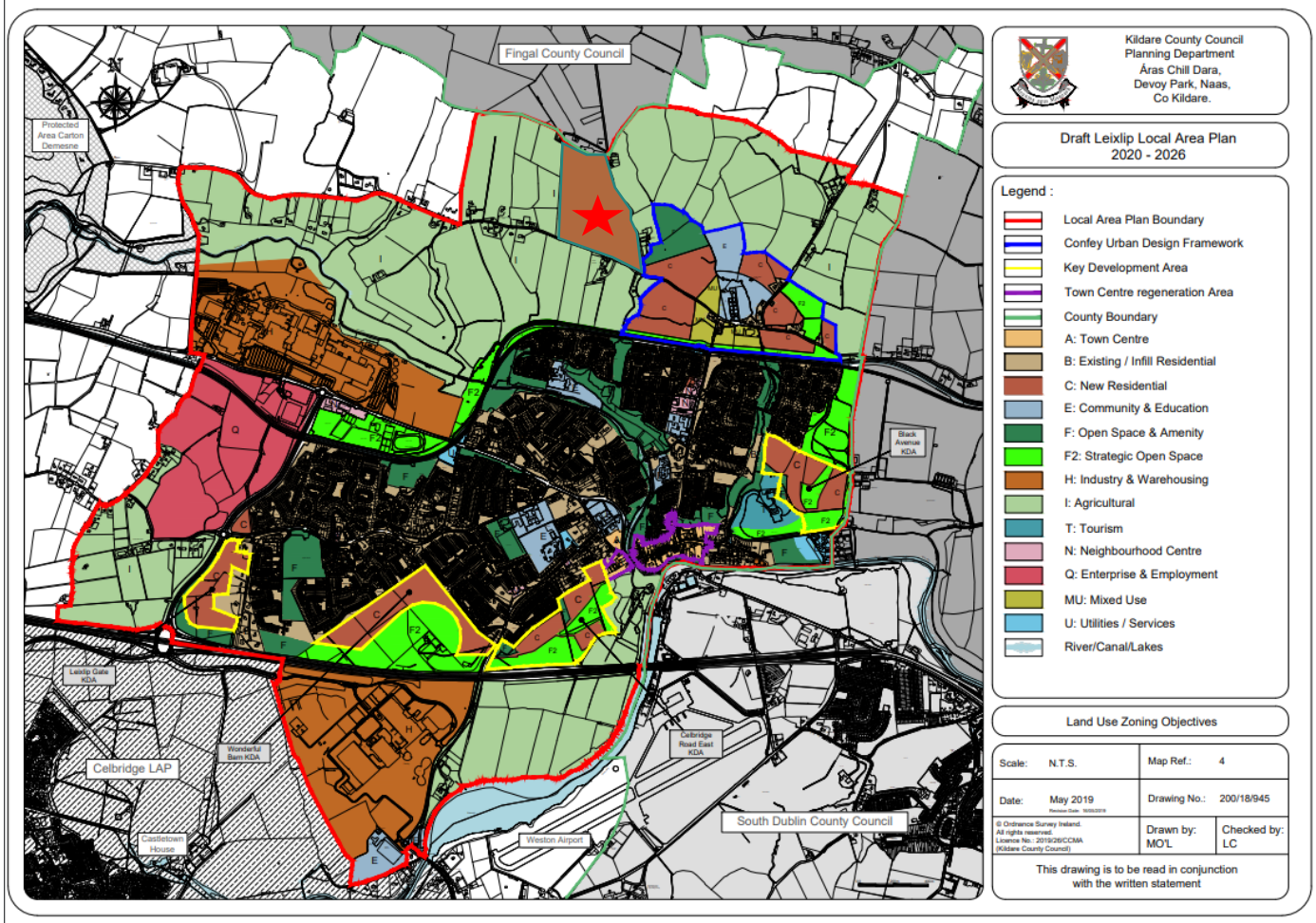


Figure 12 Draft land use zoning map under the Draft Leixlip LAP with subject site highlighted.



Figure 13 Draft Land Use Zoning Map from the Draft Confey UDF.



Figure 14 Draft land Use Map with subject site incorporated.