

Heather Cooke

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From: Barry Healy-Cunningham <[REDACTED]>
Organisation: Citizen

Message Body:
Please find attached my submission on the Draft RSES

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Submission in response to the Eastern and Midland Regional Assembly Draft Regional Spatial and Economic Strategy (2019)

- 1) With regard to the Regional Flood Risk Appraisal Report; I do not feel that sufficient attention has been given to the site at Leixlip designated Celbridge Road East for the following reasons.
 - a) **Section 4.7.2 Groundwater Flooding**, due to the OPW concluding that groundwater flooding is mostly confined to the West of Ireland, it was determined that further assessments on the issue should be determined in lower level development plans.
No such assessment was carried out by Kildare County Council with regard to the lands designated Celbridge Road East and furthermore no recognition was given by Kildare County Council on the potential impact to the water table at these lands from the waste soil deposits dumped on these lands (artificially raising the heights of this land parcel from between 1 to 2 metres) during the construction of the M4 Motorway.
 - b) **Section 4.8.13** states *“Celbridge Rd E – Low risk of fluvial flooding, assessed in the KCC SFRA”*. However **Section 8.2 Flood Zones and Flood Risk** states that *“The flood zone maps are derived from the Eastern CFRAM Study. The Flood Zone mapping is based on the best currently available data and a more detailed, site specific FRA may generate localised flood extents..... They should not be used to suggest that any areas are free from flood risk as they do not account for potential flooding from pluvial and groundwater flooding”*

Again no data has been generated through the Local Area Plan process on the localized flood risks at Celbridge Road East despite the multiple submissions processes carried out during 2017 and 2018 highlighting concerns re flooding. These concerns were reinforced with reports on historical flooding at the Gatekeepers lodge on the site of Celbridge Road East lands and satellite imagery showing a marked difference in the lands at Celbridge Road East in comparison to adjoining land indicating possible issues with the water table created by the dumping a proportion of the 400,000 cubic meters of excavated material from the M4 construction at this site

<http://www.engineersjournal.ie/2016/04/19/m4-motorway-construction-2/>

- 2) In the document **EMRA Draft RSES, Section 5.6 Integrated Land Use and Transportation**, with particular emphasis on **5.1 the North-West Corridor section**. The proposed development land at Confey is noted for its poor links to Leixlip and adjoining Dublin/Math lands. What is omitted is the Celbridge Road East site, even though it was raised as part of the Flood Risk Appraisal report.

Through its omission nothing is mentioned of the poor connectivity of the R404 (servicing Celbridge Road East) to the R148 (Maynooth to Leixlip Road). The issue of increased traffic volume on this road from the development of the site at The Wonderful Barn and the change in business type of the Hewlett Packard site are not addressed.

It has been acknowledged by Kildare County Council that this link to Leixlip is not fit for requirement by the addition to the **Leixlip Local Area Plan 2017-2023** (post submissions process) of **section MT03.4 (iv)** *“The improvement of the intersection between R404 (Celbridge Road) and R148 (Main Street).”*

It should be noted that MT03.4 is only an undertaking to investigate the feasibility to make any improvements, there are no plans in place to make actual changes.