DART + West Railway Order An Bord Pleanála Oral Hearing

ABP-314232-22

Submission Prepared by

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On behalf of

St. Patrick's College Maynooth

October 2023





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1.0 INTRODUCTION

Qualifications and Professional Experience

- 1.1 My name is John Spain. I am the managing director of John Spain Associates, Planning Consultancy. I have over 30 year's planning and development consultancy experience in Ireland and in the UK. I am a Member and Past President of the Irish Planning Institute, a Member of the Royal Town Planning Institute and a Member of the Society of Chartered Surveyors.
- 1.2 John Spain Associates are planning consultants for St Patrick's College, Maynooth.
- 1.3 This evidence does not reiterate the detailed points addressed within the original submission on the Railway Order which are considered as read by all parties. I will however address the updates of the relevant policy context and CIÉ's Response to Submissions.

Planning Context

- 1.4 Our client, St Patrick's College Maynooth (SPCM), welcomes the opportunity to make a submission to the Oral Hearing in regard to the Railway Order for the DART + West line (ABP Reg. Ref. 314232-22). This submission should be read in conjunction with the original submission by SPCM on the Railway Order; and the presentation by JSA and DBFL on behalf of SPCM at the Oral Hearing itself.
- 1.5 Maynooth is an important university town targeted for significant growth in the next decade within the Regional Spatial Economic Strategy (RSES) for the Eastern and Midlands Region. A significant number of St. Patrick's College and Maynooth University staff and students are frequent users of the existing train services. Therefore, SPCM is strongly supportive of CIÉ/Irish Rail's proposals to electrify the Maynooth line and to considerably increase the capacity and frequency of train services along this line.
- 1.6 This submission focuses primarily on proposals as they relate to the town of Maynooth, and the need for an integrated approach between DART + West and future planned infrastructure. This primarily includes the plans for a new station to the west of Maynooth, associated park and ride facilities and the Maynooth Outer Orbital Road (MOOR) identified for Maynooth.
- 1.7 SPCM are significant landholders in Maynooth, Co. Kildare, the landholding extends westwards from Maynooth town centre to the west of St Patrick's College and Maynooth University. At present it comprises a series of agricultural fields north and south of the Kilcock Road (R148).



Figure 1.1: Aerial view of SPCM Landholding (Source: Google Maps, 2023).

- 1.8 The Railway Order application includes permanent and temporary land take from SPCM in relation to the proposed replacement electricity pylon and the closure of the existing road at Jackson's bridge. There is a permanent acquisition plot DW.038 P.93(A) that is being acquired in relation to an ESB Pylon/Mast.
- St Patrick's College Maynooth welcomes the Dart+ West proposals and supports the application for the Railway Order in principle. However it is highly important to ensure that the proposals are fully consistent with the existing and emerging statutory planning context for Maynooth, including planned infrastructure to facilitate the future growth and development of the town' in accordance with government's national development strategy Ireland 2040 (National Planning Framework and the National Development Plan); the Regional Spatial and Economic Strategy for the East and Midlands Region (RSES); The Greater Dublin Area Transport Strategy 2022-2042; the Kildare County Development Plan 2023-29 and the emerging Maynooth Local Area Plan. The submission makes a number of specific proposals as to how the proposed DART + West application could be further enhanced and integrated with wider land use and transportation plans for Maynooth.
- 1.10 The RSES specifically identifies lands at "the north and west of the town near Maynooth University" (page 75 RSES) for significant residential development, and also identifies the important employment potential of the new research & technology park, again located to the west of the town near the College & University. This has direct implications for the DART + West project west of Maynooth town centre.
- 1.11 SPCM has engaged with previous consultations to date including publication by Irish Rail of the Emerging Preferred Option for the DART + West route to Maynooth in October 2020 and the Preferred Option for the DART + West route to Maynooth in September 2021.

- 1.12 Since the preparation of the SPCM submission on the Railway Order a number of important policy changes have taken place:
 - The Kildare County Development Plan 2023 2029 came into effect on 28th January 2023.
 - Kildare County Council and Meath County Council commenced preparation of the Maynooth LAP in October 2022.
 - The National Transport Authority adopted the Greater Dublin Area Transport Strategy 2022-2042.
 - The publication of Phase 2 of the Draft Maynooth & Environs Transport Strategy Consultant in November 2022.
- 1.13 The NTA's Greater Dublin Area Transport Strategy 2022-2042 and The Kildare County Development Plan 2023 2029 both now include objectives for an additional train station in West Maynooth, on the Dart Plus West line.
- 1.14 The County Development Plan also includes an objective for a Maynooth Outer Orbital Route which will interface with the Dart Plus West proposals and an objective (UD2) to prepare a Masterplan / Urban Design Frameworks for 'Collegelands (lands to west of Maynooth, adjoining Maynooth University and St. Patrick's College)'.
- 1.15 It is respectfully submitted that it is important to ensure that the Dart + proposals are fully consistent terms of concept and in terms of detailed design with relevant regional, county and local planning policies, and that there is a need for the Applicant to further demonstrate that the current proposals consistent with such planning policies, including those which have been adopted since the Railway Order application was submitted to the Board.

2.0 NATIONAL & REGIONAL PLANNING POLICY CONTEXT

- 2.1 Since the preparation of the SPCM submission on the Railway Order a number of significant policy changes and developments have taken place:
 - The National Transport Authority adopted the Greater Dublin Area Transport Strategy 2022-2042.
 - The Kildare County Development Plan 2023 2029 came into effect on 28th January 2023.
 - Kildare County Council and Meath County Council commenced preparation of the Maynooth LAP in October 2022.
 - The Phase 2 of the public consultation for the Draft Maynooth & Environs Transport Strategy was published in November 2022
- 2.2 The Maynooth LAP 2013-2019 was adopted on the 26th of August 2013, and was amended once on the 5th November 2018. While the Plan formally expired in August 2019, it may remain as a point of reference until a replacement LAP has been prepared. The LAP envisages that Maynooth will continue to grow over the short to medium term to achieve a critical mass which will support competitiveness, sustainability and create opportunities for economies of scale. Its development will be complemented with a range of employment, recreational, cultural, retail and educational facilities appropriate for a town of its size.

The National Transport Authority adopted the Greater Dublin Area Transport Strategy 2022-2042

- 2.3 Section 12.4.3 relates to DART+ West, includes the following:
 - Electrification of the Maynooth line from City Centre to Maynooth (40km approx.);
 - · City Centre enhancements at Connolly;
 - Construction of a new DART depot facility west of Maynooth Station;
 - Integration with a combined metro / rail station to be developed at Glasnevin under the MetroLink project to serve both the Maynooth Line and Kildare Line;
 - Elimination of level crossings;
 - Relocation of Docklands Station to integrate with Luas and better serve routes entering the City Centre; and
 - New grade-separated pedestrian, cycle and vehicle crossings as required.
- 2.4 Measure RAIL1 DART+ states:

"The DART+ Programme will be implemented, providing electrified services to Drogheda in the north and Maynooth plus Celbridge in the west, in addition to an enhanced level of service to Greystones. The programme will include additional fleet, aligned with higher passenger demand, and a higher frequency of service on all lines."

2.5 We also note an objective to provide the rail station to the west of Maynooth, Measure RAIL6 – New Rail Stations states:

"The NTA, in conjunction with Irish Rail, will develop new rail stations at Cabra, Glasnevin, Heuston West, Kylemore, Woodbrook, west of Sallins, west of Louisa Bridge **and west of Maynooth**. Kishoge station will also open in the short term as development of the Clonburris SDZ is realised. Other stations will be considered where development patterns support such provision."

2.6 As highlighted by the above extracts the Dart + improvements are an important part of the overall strategy for Maynooth. The provision of a second railway station is also clearly identified and now firmly established in the medium and long term planning strategy for Maynooth. The Greater Dublin Area Transport Strategy 2022-2042 is generally supportive of park and ride facilities and identifies additional facilities of up to 1,000 spaces in Maynooth.

Regional Spatial & Economic Strategy

- 2.7 The Eastern & Midland Regional Assembly adopted the Regional Spatial & Economic Strategy (RSES) in June 2019. The principal purpose of the RSES is to implement the policies and objective of the National Planning Framework and Government economic policies. Therefore, the overarching National Policy Objectives set out in the NPF are carried through into the RSES, most notably the policies of promoting compact urban growth.
- 2.8 Specifically, in relation to Maynooth, the RSES designates the town as a **Key Metropolitan Town,** which is targeted for substantial growth over the coming decade. Maynooth is only one of three such towns so designated (the other two are Swords & Bray).
- 2.9 Maynooth is also located on the North-West Corridor, one of the five such strategic corridors identified in the Metropolitan Area Strategic Plan (MASP) for Dublin, and which has been targeted for growth. (See Figure 1 below). Set out below is a diagram taken from the MASP (Figure 5.2 on page 103) and a summary of what is proposed for the North West Corridor (page 102):

North - West Corridor (Maynooth/Dunboyne line and DART expansion)

"Strategic development areas along the Dunboyne/M3 parkway line include the Dublin Enterprise Zone (linked to improved bus connections), Hansfield lands and the sequential development of lands in Dunboyne served by the M3 Parkway station. The proposed electrification of the main Maynooth line, to be delivered by 2027, will support sequential growth in Leixlip and Maynooth". (emphasis added).

Figure 2.1: Dublin MASP



2.10 The MASP goes on to identify strategic development areas of regional significance within the defined corridors and establishes what their capacities are, and what additional infrastructure is required to enable their development potential to be realised. Set out below in Table 1, (which is an extract of Table 5.1 of the MASP) is a summary of the capacity, infrastructural needs and phasing of the situation with regard to the North West Corridor.

Table 1: Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing

Corridor	Residential	Employment/ Mixed Use	Phasing/Enabling infrastructure
North-West corridor (Maynooth/ Dunboyne commuter	Dublin 15 lands – continued development of Hansfield linked to the future development of Barnhill and Kellytown landbanks to the south and east	Further development of large- scale employment in Dublin Enterprise Zone" and synergies with Blanchardstown IT	Short term Public transport, Clonsilla Station, water network and waste water upgrades.
Population capacity Short 24,000 Medium 10,000 Long 3,000	Leixlip - strategic greenfield lands near Confey station with capacity for phased development, improve links to Leixlip and adjoining Dublin/Meath lands Maynooth - Significant strategic residential capacity at Railpark lands and to the north and west of the town near Maynooth University	Large scale former Hewlett Packard site and Collinstown site to strengthen employment base for North Kildare New Research & technology Park adjoining Maynooth University	Short to Medium term LUAS extension to Maynooth, roads upgrades, community and social infrastructure, waste water and local water network upgrades Short to Medium term DART expansion, road upgrades, bridge, Maynooth Outer Orbital Route, waste water and local water network upgrades
	Dunboyne Sequential development prioritising zoned and serviced lands near the railway station and town centre and at Dunboyne North / M3 Parkway station	Space intensive 'big box' employment at Portan. Mixed use 'live - work' development at Dunboyne North	Medium to Long term Outer Orbital road, distributor road, additional watermains and waste water upgrades

2.11 The RSES specifically identifies lands at "the north and west of the town near Maynooth University" (page 75 RSES) for significant residential development, and also identifies the important employment potential of the new research & technology park, again located to the west of the town near the College & University. This has direct implications for the DART + West project west of Maynooth town centre.

Kildare Development Plan

- 2.12 The Kildare County Development Plan 2023 2029 came into effect on 28th January 2023 contains a number of objectives supporting key infrastructure development for Maynooth, including the provision of a second rail station, the delivery of the Maynooth Outer Orbital Route (MOOR) and general support for park and ride facilities.
- 2.13 The Development Plan reflects the provisions of the RSES, noting that Maynooth is also located on the North-West Corridor, one of the five such strategic corridors identified in the Metropolitan Area Strategic Plan (MASP) for Dublin, and which has been targeted for significant growth in the coming decade.

 Transport objectives
- 2.14 The following transport related objectives are of direct relevance to the Dart + proposals.
- 2.15 We note Objective TM O10 as states:

Facilitate and secure the delivery/implementation of the public transport projects that relate to County Kildare as identified within the Integrated Implementation Plan (2019-2024), (or any superseding document), including the DART+ programme (Including DART+ West and DART+ South West), BusConnects and the light rail investments. The DART+ projects present an opportunity to improve journey time, reliability, and train frequency.

2.16 We note Objective TM O54:

Support and facilitate, in co-operation with Irish Rail and the National Transport Authority the delivery of the following proposed new facilities to connect to the existing and proposed rail network;

- A second railway station, sited to the west of the existing station in Sallins, including a park and ride facility (1, 000 spaces).
- · A second Maynooth railway station/depot sited to the west of Maynooth
- A railway station at Collinstown including a Park and Ride facility (c. 1,000 spaces 500 initially) and
- A Kill park and ride facility bus based (500 spaces)
- 2.17 In regard to the MOOR, TM O32 states:

"Ensure the provision of improved cycle and walking infrastructure linking Maynooth Town Centre, the Royal Canal Greenway, the train station, the proposed Maynooth Outer Orbital Route and to Kilcock, Celbridge and Leixlip"

2.18 The importance of the MOOR is also reflected in Table 5.4 'Priority Road and Bridge Projects':

Table 5.4 - Priority Road and Bridge Projects²⁴

Nr.	Name	Route
Α	Maynooth Eastern Ring Road (MERR)	R148 to R405 – Leixlip Road to Celbridge Road
В	Maynooth Outer Orbital Route (Northwest)	L1012 Moyglare Road and Dunboyne Road (Co. Meath) to be delivered by Meath County Council under Section 85 agreement.
С	Maynooth Outer Orbital Route (West/Southwest)	R148 to L1012 c. 3km – Kilcock Road to Moyglare Road and from the Kilcock Road south to Rathcoffey/Straffan Road.

2.19 More generally we note Chapter 14 Urban Design, Placemaking and Regeneration provides for a Masterplan / Urban Design Framework for lands at St. Patrick's College. Objective UD A2 aims to:

"Prepare a series of Masterplans / Urban Design Frameworks over the lifetime of the Plan, in co-operation with relevant stakeholders, including but not limited to the following areas:..

...Collegelands (lands to west of Maynooth, adjoining Maynooth University and St. Patrick's College)"

2.20 As highlighted by the above objectives the provision of a second railway station and the MOOR are clearly identified and now firmly established in the medium and long term strategy for Maynooth.

We also note that the plans also support Park and Ride facilities generally.

2.21 TM O90 states:

"Co-operate with other agencies in the provision of additional links between the national road network and public transport especially rail and bus transport including strategic park and ride facilities."

Maynooth Local Area Plan (LAP)

- 2.22 Kildare County Council and Meath County Council have commenced the preparation of a Joint Local Area Plan (LAP) for Maynooth and its environs. The Joint LAP incorporates a framework for guiding the future development of transportation, housing, retail, heritage, employment, and social and community infrastructure in Maynooth.
- 2.23 In regard to the provision of an addition train station west of Maynooth, it should be noted that the Issues Paper states:

"In addition to the above, the Draft Transport Strategy for the Greater Dublin Area 2022-2042 provides for a second train station to be constructed to the west of the town. Both stations in the town are intended to be served by DART+ West once constructed.

Given the substantial residential and employment growth targeted for Maynooth, it will be critical for the Joint Local Area Plan to develop an integrated land use and transport strategy which determines the most appropriate locations for this development to occur within the town."

- 2.24 The Issues Paper includes a diagram (see figure 1 below) to illustrate the emerging future development strategy for Maynooth. We note that a significant new potential development area is identified to the west of Maynooth, with the southern lands shown as a 'Potential Transit Oriented Development site' and the northern lands are shown as 'Identified location for Future Economic and Residential Development'. This is consistent with the RSES and County Development Plan as referenced previously.
- 2.25 The proposed new Maynooth west train station, and associated park & ride facility, is shown on this diagram, as is the Maynooth Outer Orbital Road (MOOR) proposal. This further demonstrates the commitment of both Kildare and Meath County Councils to the delivery of the proposed new train station for Maynooth to the west of the town, and how the spatial development strategy for Maynooth, as will be set out in the new Joint LAP, will be closely aligned with the delivery of public transport infrastructure as proposed under the NTA's Transport Strategy for the GDA 2022-2042.
- 2.26 Thus, consideration of this emerging local planning policy framework needs also to be taken into account in the assessment of the current proposals for DART + West. In this regard we set out in the following section how the local planning policies and objectives

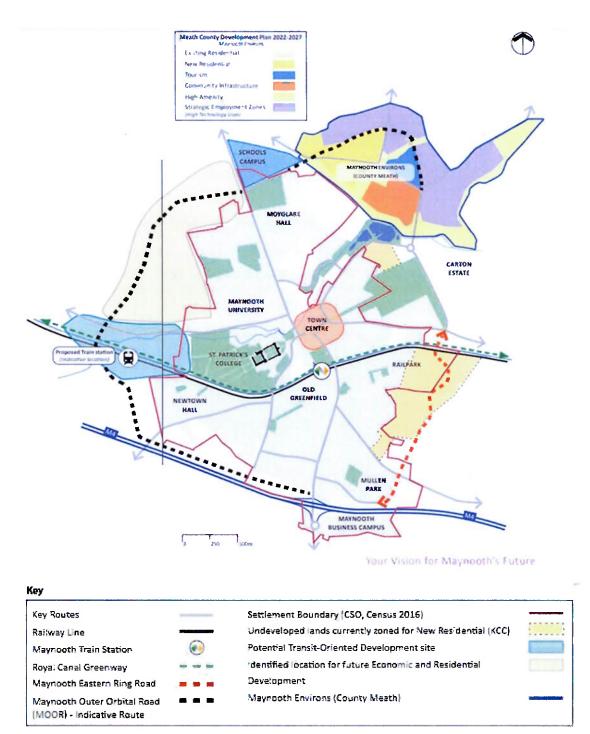


Figure 2.2: Proposed Development Strategy, Joint Maynooth Issues Paper, Kildare & Meath County Councils, 2022.

The Draft Maynooth & Environs Transport Strategy

- 2.27 The Phase 2 of the public consultation for the Draft Maynooth & Environs Transport Strategy was published in November 2022, this strategy proposes measures to improve walking, cycling, public transport, roads and parking in Maynooth and its environs. The strategy will place particular focus on improving conditions for pedestrians, cyclists and public transport users.
- 2.28 An objective for new Western Railway Station is included on the public transport strategy map.
- 2.29 The Strategy aims to provide Park/Ride at New Maynooth West Train Station
- 2.30 We note that the future delivery of the MOOR is clearly included within future plans for Maynooth as illustrated in its 'draft roads strategy' (Figure 2.3 below). The strategy also illustrates public transport, walking and cycling routes to the west of Maynooth linking with the MOOR and SPCM lands.

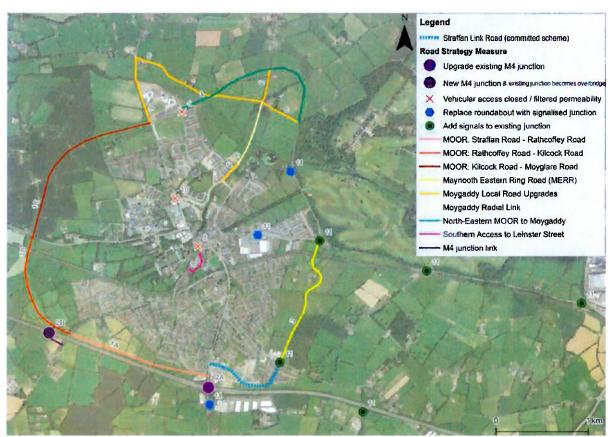


Figure 2.3: Extract the Draft Maynooth & Environs Transport Strategy Roads Strategy (Source: KCC, 2022).

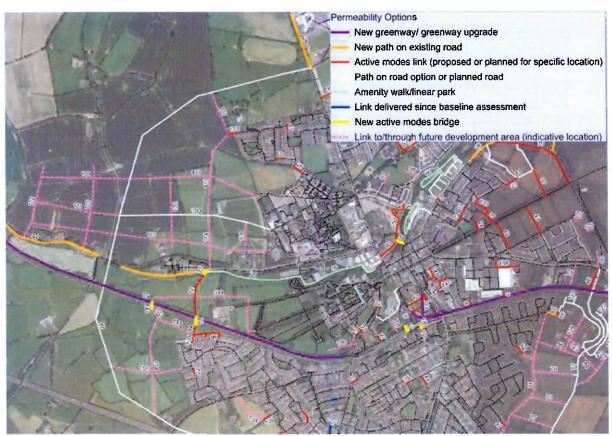


Figure 2.4: Extract the Draft Maynooth & Environs Transport Strategy Walking Strategy (Source: KCC, 2022).

3.0 RESPONSE TO SUBMISSION ON OBSERVATIONS TO THE DRAFT RAILWAY ORDER APPLICATION'

3.1 CIÉ have prepared a document entitled 'Submission on Observations to the Draft Railway Order Application' in response to submissions on the Railway Order. In particular Section 3.36 notes the SPCM Submission and responds to the queries raised. In response to this document we have set out our response as below:

New Dart Station

3.2 In regard to the New Dart Station, the document states:

"The existing project includes modifications to Maynooth train station to allow for the planned increases in capacity. This project does not preclude the provision of a new train station and or park-and-ride facility which can be progressed as part of a separate application at a later date."

"The provision of the new station is not included in the DART+ West scope- however, any future station will be considered as a separate project, taking the DART+ West project proposals into consideration"

- 3.3 We welcome CIÉ's comment in regard to the new train station, however considering the above highlighted changes in policy we submit that it is necessary to further demonstrate that Dart + West proposals can be integrated with the planned new railway station objectives in the future, so as to ensure the proposed scheme does not prejudice the achievement of these objectives.
- 3.4 As set out in our recent submission there are a number of technical considerations which will need to be addressed. We would respectfully request that the Board should seek from ClÉ/Irish Rail further design, engineering and related environmental details including gradient, curvature and height of the proposed realigned track to the west of Maynooth so as to demonstrate to the Board that the current plans are compatible with the future delivery of a new station, and that the necessary land for the delivery of such a station and associated park & ride facility, is included within the proposed Railway Order. This should include a demonstration that the proposed flood risk related works are consistent with the provision of a future station and park and ride facility at this location, including access routes to the station.
- 3.5 However, given that lands in the vicinity of Jackson's Bridge where the realigned rail line is proposed are subject to flooding, it would be important that not alone would the applicant demonstrate consistency with the emerging planning policies, but also that the inclusion of a train station and associated P&R is fully detailed so as to be compatible with the flood compensatory measures required in this area.

Park and Ride facilities

3.6 In regard to future Park and Ride facilities, the CIÉ report states:

"The objectives of the DART+ West project is to increase capacity and electrify the line. Additional car parking facilities are not within the scope of the DART+ West project. However, larnród Éireann's Network Enhancement Division and the National Transport Authority's Park & Ride Development Office are working on other projects to deliver enhanced parking at stations, for cars and bicycles in parallel to DART+ West."

- 3.7 A new station here would be the first station on the DART West line and would therefore be the opportune location for a Park & Ride service into Dublin for the population along the M4 corridor reducing pressure on the heavily congested national road network east of Maynooth. The opportunity to park and ride via frequent and reliable services with seamless access to and from the M4 is considered to be significant as it will reduce vehicular traffic on the M4 and into Dublin. The existing Maynooth station has a significant shortfall in such parking facilities with limited scope for expansion.
- 3.8 We consider it imperative that the ClÉ/Irish Rail's proposals should demonstrate their compatibility with the National Transport Authority's plans for a Park & Ride facility to be delivered in Maynooth.

Maynooth Outer Orbital Road (MOOR)

3.9 In regard to the MOOR proposals:

"As identified in the Maynooth Local Area Plan 2013-2019 (Amendment No.1). the location of map-based Road Objective (i) – (vii) on Map 1 which cumulatively form the Maynooth Outer Orbital Road (MOOR) are 'indicative only'. At the time of preparation of the Railway Order application for the DART+ West project, the planning stage of the MOOR did not commence. The project team on the MOOR will therefore need to be cognisant of the DART+ West project proposals, and incorporate the design of the project, where appropriate."

- 3.10 As outlined above in Section 2.0 of this submission proposals for the MOOR are now clearly established in the planning policy context for Maynooth within the Kildare Development Plan and as initially identified in the Maynooth LAP issues Paper and the Maynooth Transport Strategy. We submit that it is necessary to further demonstrate the that the Dart + can integrate with objectives to provide the MOOR.
- 3.11 The 2013-2019 Local Area Plan (LAP) for Maynooth identifies within its Road Objective's Plan, shown in Figure 4. This objective for an orbital road to the west of the town is to be retained in the new LAP for Maynooth. As shown in Figure 2 above, which is taken from the recently published Maynooth Issues Paper, an outer orbital road remains an objective of the Council, but has been renamed as the 'Maynooth Outer Orbital Road' (MOOR).

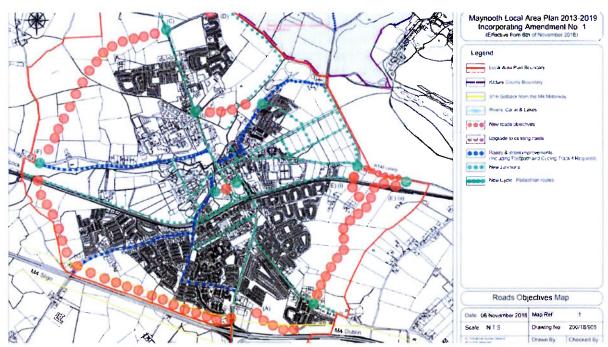


Figure 3.1: Transport Objectives for Maynooth as contained in Maynooth LAP 2013-2019

- 3.12 This Orbital Road is considered to be a key piece of infrastructure that will:
 - Assist in the delivery of development to the west of Maynooth by providing an alternative vehicular route avoiding the congestion within the centre of Maynooth;
 and
 - Provide a means by which existing traffic to the north of Maynooth, including that associated with SCPM and Maynooth University, can access the M4 without travelling through central Maynooth.
- 3.13 We welcome the response from CIÉ however there are key technical considerations which have not been addressed in detail, we wish to see further detailed demonstration that the Dart + West project is consistent with and will not preclude future proposals for the new station, the MOOR and park and ride facilities.
- 3.14 We welcome the response from CIÉ that the project will not preclude additional infrastructure, however there are key technical considerations which have not been addressed in the documentation to date. We respectfully submit that the Board should require a further detailed demonstration that the Dart + West project is consistent with the new station, MOOR, and park and ride facilities, specifically showing how the proposed levels and flood storage works in the Jackson Bridge will be accommodated and are consistent with the provision of this future planned infrastructure and how it will not preclude these future proposals.

4.0 CONCLUSIONS

- 4.1 St. Patrick's College, Maynooth welcomes the Dart + West proposals for the upgrade of the railway service to Maynooth. The College anticipates that the enhanced railway service will take pressure off the existing town centre station and will also be consistent with the statutory planning framework set out for the expansion of Maynooth to the west in the RSES and the adopted Development Plan. We note that very substantial population increases are projected for the town, and that the RSES identifies that most of this future growth will be to the west and north, where extensive undeveloped lands are located.
- 4.2 There is an important opportunity to integrate the DART + West proposals with the planning framework for Maynooth, as set out in the RSES, the GDA Transport Strategy 2022-2042, the Kildare County Development Plan 2023-2029 and the direction of the new Maynooth LAP in order to improve the accessibility between the expanding urban area and the railway service through provision of a new west Maynooth railway station. The Draft Maynooth Transport Strategy also anticipates the inclusion of the MOOR.
- 4.3 In particular, both the Transport Strategy for the Greater Dublin Area 2022-2042 published by the NTA, and the Kildare County Development Plan 2023-2029 contain specific objectives for a new train station to be developed to the west of Maynooth town. It is respectfully submitted however that the current plans and documentation before the Board do not adequately demonstrate compatibility with the objectives for anew stion in West Maynooth in existing statutory planning framework.
- 4.4 It is further submitted that the proposed DART + West plans do not adequately demonstrate compatibility with the planned Maynooth Outer Orbital Road, an objective of the Kildare County Development Plan 2023-2029. This objective is also referenced in in the Issues Paper for the forthcoming Joint Local Area Plan for Maynooth, under preparation by both Kildare & Meath County Councils. It is submitted that it is important that the DART + West proposal is fully consistent with statutory planning framework for the area and the key infrastructure objectives contained therein, including the proposed Maynooth West train station and the planned Maynooth Outer Orbital Road. We respectively request that the Applicant clearly demonstrate this compatibility.
- 4.5 We welcome the response from CIÉ that the project will not preclude additional infrastructure, however there are key technical considerations which have not been addressed in any detail in the documentation to date. It is submitted that ABP request the applicant to provide documentation clearly demonstrating that the Dart + West project is consistent with the new station, MOOR, and park and ride facilities, specifically how it will not preclude these future proposals.