

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902

16 Glendale Est.,  
Leixlip,  
Co. Kildare,  
W23 FA59

Date: 25<sup>th</sup> October 2022

**Re: DART+ West Railway Order - Dublin City to Maynooth and M3 Parkway**

Dear Sir/Madam,

We are writing to submit our observations on the DART+ West Electrified Railway Order 2022 (Case reference: NA29S.314232 - <https://www.pleanala.ie/en-ie/case/314232>).

In particular we would like to raise our concerns with the proposals for the development for Leixlip Confey Station, and the associated works at Cope Bridge and on the green space Glendale Estate, Leixlip, Co. Kildare.

Our concerns relate primarily to:

1. the location of the proposed substation in Glendale Estate, and
2. the changes at and around Cope Bridge and Glendale Estate.

**1. Proposed Substation at Glendale Estate**

We note that a need has been identified for a substation at Leixlip Confey Station and that the current proposal is to construct that on the green park at Glendale Estate, rather than within the grounds of Leixlip Confey train station as per the original proposal. We have fundamental concerns with this revised proposal and have identified several reasons for seeking an alternative solution.

Firstly, we believe that the original option 1 is a far better solution than the proposed current option ('option 2'). As was already identified in section 3.6.1.5.9 of Chapter 3 "Alternatives" of Volume 2 Main Text of EIA (see <https://www.dartplus.ie/S3mvc/media/DART-West-Railway-Order/4%20EIA/VOLUME%202%20Main%20Text/Chapter-03-Alternatives.pdf>), option 1:

- is located in proximity to existing railway building infrastructure,
- can be easily accessed off the existing local road,
- is located wholly within CIÉ lands,

- has existing potable and foul water services available in close proximity, and
- has no clash with existing utilities networks with both the foul gravity and water supply connections available along the station entrance road.

We note that the reason for the change to option 2 was due to:

- i. an increase in the floor area of the substation, and
- ii. a need for a pathway around the perimeter of the substation.

Examining the drawings provided as part of the application, it would seem to us that there is no reason why this still cannot be achieved within the footprint of the CIÉ lands. Specifically, we have extracted a copy of drawing MAY MDC SET RS12 DR Z 0003 D, and superimposed the building with its perimeter pathway within the lands of the station. This image (in Appendix I) shows that even with the perimeter pathway (in red), there is space between the boundary wall (pink line) and the perimeter pathway, and also between the perimeter pathway and the platform. This clearly demonstrates that there is sufficient space at the train station to accommodate a single storey substation of the existing size which is accessible on all sides as per the original preference. We would also at this point ask that consideration be given to the design and layout of the substation and whether amendments could be made to the design in order to better accommodate it on the particular site. For example:

- could the ESB section be at a 90-degree angle to the substation as per the proposed substation at Dunboyne station (ref. Drawing MAY MDC SET RS16 DR Z 0003 D in Appendix I)?
- could the platform also be used as an access point for the substation as is planned at Ashtown station (ref. MAY MDC SET ROUT DR Z 0003 D in Appendix I). As per our drawing in the Annex, we don't believe this is required, but it would provide more flexibility in providing access around the perimeter of the substation.
- why is the pathway required around all sides of the substation proposed at Leixlip Confey? We cannot find any reason stated for this, although it is one of the reasons stated for needing to move the substation from Option 1 location to Option 2 location. We note that the proposed substation in Maynooth has the pathway on three sides only (ref. Drawing MAY MDC SET RS14 DR Z 0003 D in Appendix I). Can the same approach not be taken at Leixlip Confey substation?
- can the substation be located at Leixlip Louisa Bridge station instead? That station is located on a larger site and the substation could easily be accommodated there within the grounds owned by CIE with plenty of access space.

Given the permanency of the substations and the long-term goal of the railway order, we believe a more flexible approach would be beneficial. Based on the documentation published, it seems to us that there was not sufficient consideration given to these alternatives.

We have learnt that Irish Rail have advised that Glendale Estate is the only possible location for the substation as it is not possible for the electrical cable to be brought across the canal. However there is currently an electrical cable across the Irish Sea between Ireland and Wales, and it is also proposed to bring an electrical cable across the Irish sea from France to Cork. Therefore it cannot be the case that an electrical cable could not be brought across the canal. Nonetheless, we see no reason (as explained above and below) prohibiting the substation being built within the grounds of Leixlip Confey train station. This would also negate the need for the cable to be brought across the canal.

Locating the substation within the grounds of the train station would enable the green space at Glendale Estate to be fully retained as it is currently and as it was intended i.e. as a recreational green

area for the enjoyment of the residents of the estate who have been caretakers of that land for over 40 years at their own expense and time.

Other advantages of locating the substation within the grounds of the train station (option 1) rather than within Glendale Estate (option 2) are:

- the train station already has an established accessible road, whose sole purpose is access to the train station. On the other hand, Glendale Estate is a residential development. The proposed road access would need to be constructed and is proposed at a bend on the road, where line of sight is reduced.
- the access to the train station is managed by traffic lights, thereby making it far safer.
- it can be built without removing mature trees. On the other hand, the current proposal includes the removal of mature trees on Glendale Estate, which cannot be appropriately replaced with new growth. Therefore, the construction of the sub-station within the grounds of the train station would be more environmentally friendly.

We also observe that it is noted in the report that Option 2 “would impact less on the existing station access and parking, and more parking for the station would be possible, when compared to Option 1”.

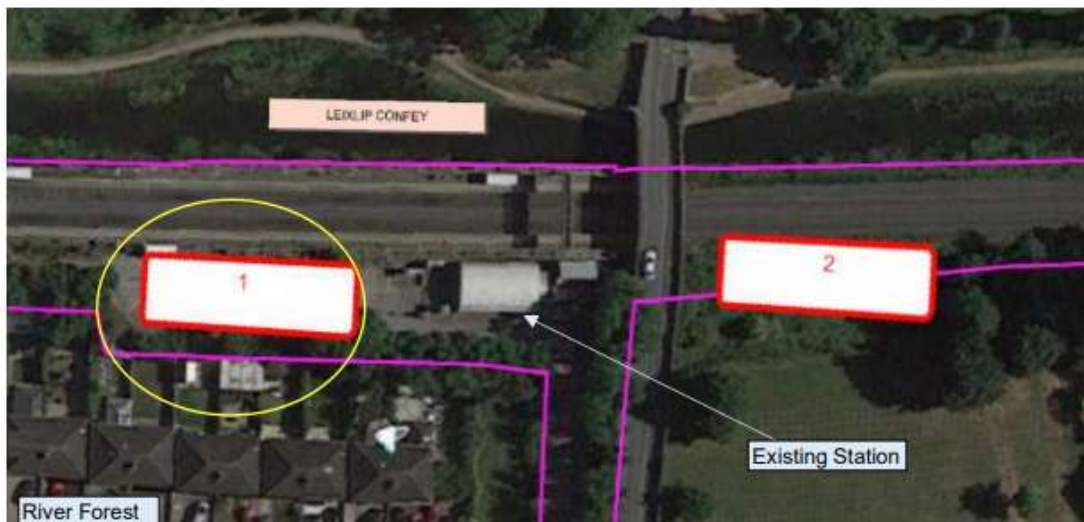
However, we believe this advantage is very limited both in terms of time and quantum of benefits, and therefore is not a strong reason for selecting Option 2 over Option 1. While the number of parking spaces at the train station may be reduced under Option 1, some would be maintained, and more could be made available by either removing the ticket office completely, given its lack of use, or by replacing it with a smaller unit. We note that only a portion of the existing quantum of spaces are usually occupied. Moreover, in terms of longer-term planning, a park and ride facility is part of the proposed development on the far side of Cope Bridge, which would make the parking at the train station effectively redundant. Therefore, the need for the car parking spaces at the train station is very short-term and could be managed with, for example, leasing a number of spaces at the Riverforest Shopping Centre carpark which always has capacity. More fundamentally, however is the fact that part of the strategic objective is to reduce reliability on cars in order to encourage more use of sustainable modes of transport. Therefore, selecting an option which provides more car parking is against one of the fundamental principles of the Dart+ West development.

We would like to further emphasise the reasons against locating the substation on the green area at Glendale Estate:

- Firstly, this is a green recreational space for the residents of the estate and neighbouring estates. That green space was included in the development and many of the current residents, who are the original owners of these houses, purchased them with the green space being part of the development. These residents have enjoyed the benefit of this green area for over 40 years in many cases, and have taken responsibility to care for and maintain this area at their own expense and time. It continues to provide an important recreational green space for all residents. We also note in this regard the Leixlip Local Area Plan (LAP) states that *“it is important to ensure that ‘Local Biodiversity Areas’, which form an important part of the county’s green infrastructure and support connectivity within the network, are maintained and given the opportunity to increase their distribution within the town”*. We consider the greenspace in Glendale Estate to be such an area of local biodiversity.
- The construction of the proposed substation would remove a large portion of the green space on a permanent basis, including the area for the building and the permanent road access. We believe this to be in the region of 740 sq. m. as per p. 148 of the Schedules (Ref. No.

DW.028.P.65(A)). The impact would be greater still as the area directly in front would also be removed. We note that Figure 3-22 'Options for Leixlip Confey substation', in Chapter 3 Alternatives, misleadingly shows the substation far closer to the train line than is actually proposed as per Drawing MAY MDC SET RS12 DR Z 0003 D. In fact, despite the fact that CIÉ does own the land along by the trainline, Option 2 proposes to place the entire substation entirely on private land. We cannot find any reason stated why the substation could not be positioned nearer to the railway line and at least partially on the land owned by CIÉ. The proposed location infringes considerably on the green space and would completely dominate it.

Figure 3-22 shows the proposed locations for the 2 options considered for the Leixlip Confey electrical substation.



**Figure 3-22 Options for Leixlip Confey substation**

Figures 3-22 shows option 2 as bordering the trainline, whereas in Drawing MAY MDC SET RS12 DR Z 0003 D, there is a considerable gap between the trainline and the proposed location of the substation.



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- The photograph shows a wide, green grassy field. A red rectangular boundary is drawn across the middle of the field, highlighting a specific area. In the background, there are several trees and a cloudy sky. In the foreground, a paved road and a signpost are visible. The signpost has a yellow diamond-shaped warning sign with a black arrow pointing right, and a black and white striped pole.

- A photomontage which shows the building without the green screening should be provided as a requirement, in order to properly assess the true impact of the building. Its establishment would impact the rest of the green area as it fundamentally changes it from being fully recreational land to mixed-use, thereby making it less attractive as an area for children to play and residents to enjoy. Therefore, it is not solely the developed area that would be impacted, but the entire green space and therefore the wellbeing of local residents. Therefore, we strongly disagree with the statement in section 4.9.1.1.3 of the Planning Report that “The substation and the associated access road is located in a discrete location of the green space area and will not significantly affect the functionality or the overall zoning designations of the area.” This clearly is not true based on the size, scale and design of the proposed substation.

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Meadows are residential estates. They do not include industrial or retail spaces and are not intended or designed for construction or industrial traffic. The construction of a permanent substation on the green space, with the proposed access road is wholly unsuited to the residential environs. It would increase road safety issues for residents, and increase burden on traffic. The proposed access road is on a bend where line of sight is considerably reduced. In a residential context this is manageable, but with the proposed addition of a permanent industrial building, this is not tenable.

- The proposed compound on the green area we presume is also in part due to the proposed relocation of the substation onto the green. This proposes to consume 6772 sq. m of greenspace (ref. p 580/581 of the Schedules, Ref. No. DW.028.T.65(A)). This is the majority of the greenspace and would destroy much of the established fauna and flora, which would take years to be re-generated. It would also negatively impact on residents' access route to the train station and use of the green area.

Overall, we see multiple disadvantages to locating the proposed substation on the greenspace at Glendale Estate, including the removal of a large green recreational area, disturbance and discomfort for residents, and traffic safety issues.

Insufficient information has been provided as to the purpose and use of the substation. We are unclear as to why it is required to be of the proposed size, and how often it will need to be accessed which will inform the volume and type of traffic that needs to access it.

We believe that there are a number of alternative solutions including the original option 1 proposed, as well as others that have not been properly considered, which could be completed with considerably less impact on the environment and residents.

## **2. Proposed works at and around Cope Bridge and Glendale Estate**

We also have concerns regarding the proposed development works at and around Cope Bridge, in terms of the planned changes to traffic management and the proposed new footbridges.

### Traffic

As residents in the area for approximately 45 years, we have observed the increase in road traffic. The current one-way system on the bridge enables traffic flow to be managed, and reduces the build-up of traffic on Captains' Hill. It also facilitates access to and from Glendale Estate as the one-way system allows for breaks in the traffic. It similarly aids with pedestrian movement from Glendale Estate to and from the Leixlip Confey train station and to the other amenities on the far side of the road.

The proposed reinstatement of two-way traffic would considerably aggravate the congestion on Captain's Hill and into Leixlip village. It would also reduce the ease at which traffic can enter and exit Glendale Estate, and the other residential estates such as Riverforest and Newtown/Avondale. The issues with traffic congestion in the area are already noted in the Leixlip LAP: *"Existing residential areas to the north of the town are located east and west of Captain's Hill and the R149 with existing residents living in these areas required to access the wider road network through the town centre or across Cope Bridge leading to congestion at these pinch points during peak times."*

It is many years since traffic on Cope Bridge was changed from two-way to single-way. This was done to accommodate a footpath. However, at the time it was done, road traffic volumes were considerably

less, and the impact of reverting to two-way traffic flow would be materially different than the situation that was previously in place.

Given the Government's intention to reduce car usage and the intention of Kildare County Council to change the road into a street that "*which will facilitate through traffic but in a pedestrian/cycle friendly manner*" (as per section 2.1.6.7 of the Leixlip LAP), we do not understand why there would be a proposal to facilitate increased road users. This seems to contradict the future plans and objectives.

#### Proposed Footbridges

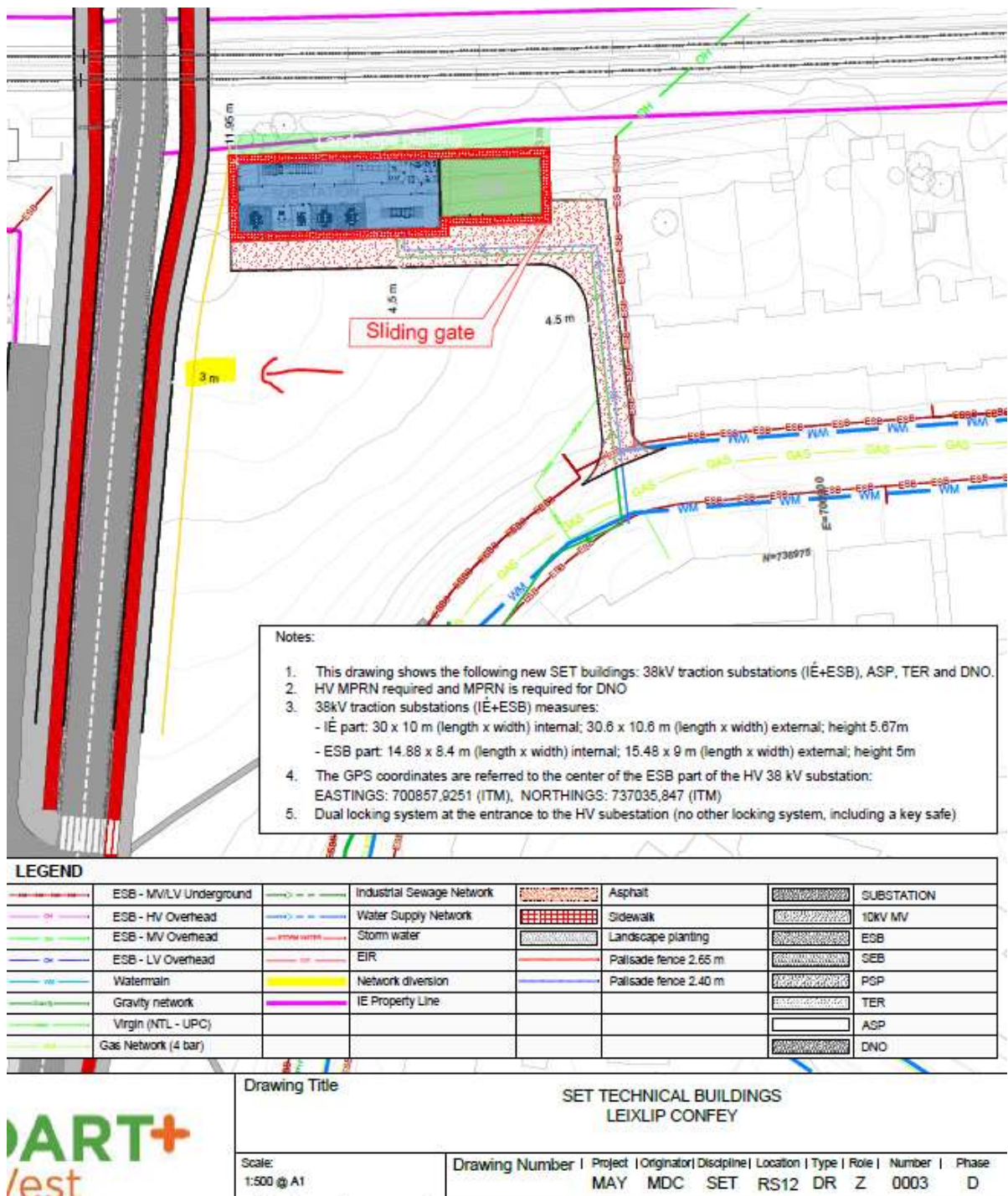
As part of the development at Copy Bridge, and in order to facilitate a return to two-way traffic flow, it is proposed to construct two new footbridges – one each on the east and west side of Cope Bridge. We understand that such development would improve safety for pedestrians and cyclists by providing separate facilities to the road. However, we question the need for two bridges, with each facilitating both pedestrians and cyclists.

We believe that there are two alternatives to this:

- Omission of the proposed east footbridge in its entirety. The proposed west footbridge would provide ample room for the volume of pedestrians and cyclists that would be traversing the canal and trainline at any point in time, given that 2m is provided for each.
- Reduction in each of the east and west footbridges so that one is dedicated to pedestrians and the other dedicated to cyclists, thereby providing further safety for each by provided full and complete separation.

The proposed east footbridge is over 4m in width. It is proposed to build it over the greenspace at Glendale Estate. However rather than constructing it in the traditional manner on pillars with free area underneath it, the proposal includes a large embankment and retaining wall. The area of this embankment is unclear, and from Drawing MAY MDC SET RS12 DR Z 0003 D, we had assumed that the yellow line with '3m' beside it was showing the size of the embankment, resulting in over 7m of greenspace removed along the full length of the existing wall, as highlighted below:





However, we believe that this is in fact not the case and that the embankment would take up considerably further space based on Drawing MAY MDC STR RS12 DR C 0003 D, which shows the green embankment area far wider at times than the footbridge and therefore wider than 4m. In fact, it appears that 3m is in fact the minimum and that the width of the embankment could be over 1.5 times the width of the footbridge at its widest. This would therefore result in the greenspace being reduced in width by over 10m at times.



We believe that full transparency on this point has not been provided, thereby making it difficult for us and others as residents to fully assess the actual impact in terms of permanent loss of our recreational amenity.

Moreover, we can see no reason for the inclusion of the embankment which only serves to further increase the amount of greenspace lost. Also, it is unclear as to who would maintain the embankment given that it is us as residents who have been maintaining the green area for 45 years.

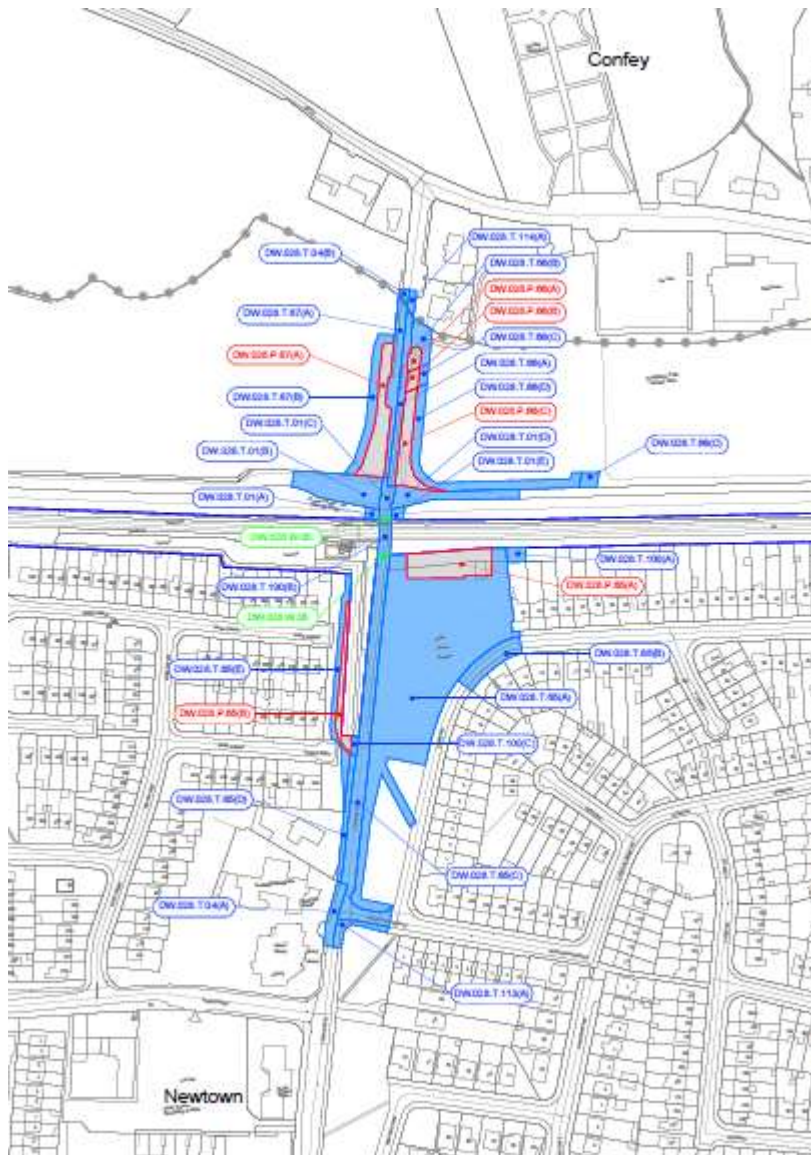
Furthermore, the proposed construction of the east footbridge includes the removal of mature trees. We see no effort being made to design a bridge in such a way as to maintain the beautiful mature trees and believe that this could be achieved with a more innovative design, and/or also with the reduction in the bridge's size to accommodate either foot or cyclist traffic only, as suggested above. The design as it is, is incongruous with the area.

It is also unclear as to why the proposed footbridges divert away from Cope Bridge over the trainline, thereby further impeding on the greenspace at Glendale Estate. We cannot find that any reason has been given, and we do not see why this would be required.

### Construction Compound

The proposal includes the majority of the greenspace at Glendale Estate being taken over as a construction compound. This is highly unsuitable in a residential area, and alternatives should be identified.

The proposal as shown in Book 2 Property Plans Part 2 shows the majority of the greenspace at Glendale Estate being taken into temporary possession:



This would effectively render the entire greenspace unusable for we presume a number of years. There would be long-term damage to the biodiversity, some of which may be irreplaceable. There would be increased pollution, noise and disturbance for residents.

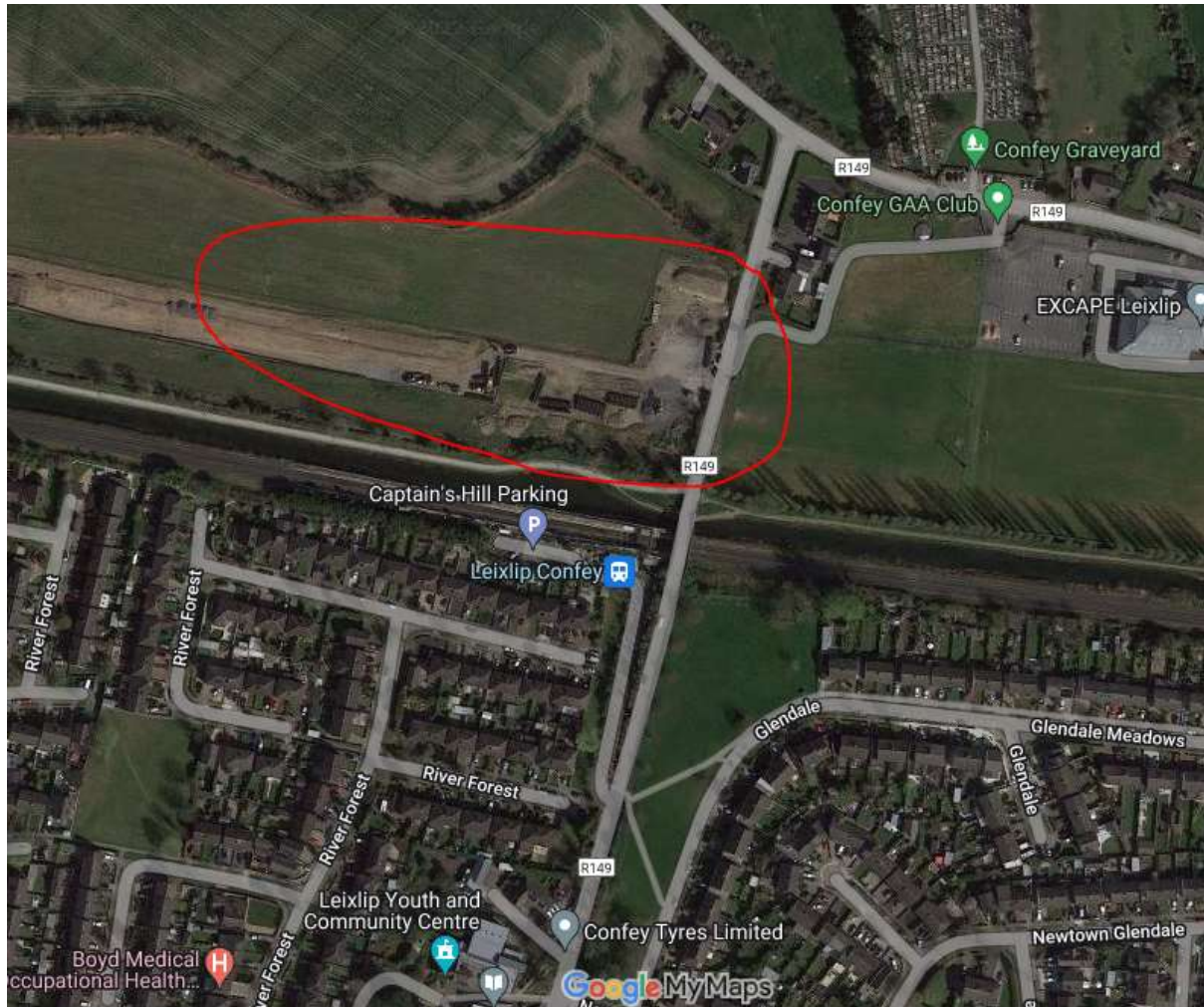
It is not clear how this compound would be used. For example, if it is proposed to be accessible by construction vehicles, how would they enter the site? It is unacceptable to expect an established residential area to be able to accommodate a high volume of construction traffic on a daily basis for a period of months or even years.

We believe that alternatives are available and must be sought. For example, the land at the train station which is under the ownership of CIÉ. There is also land in private ownership on the far side of



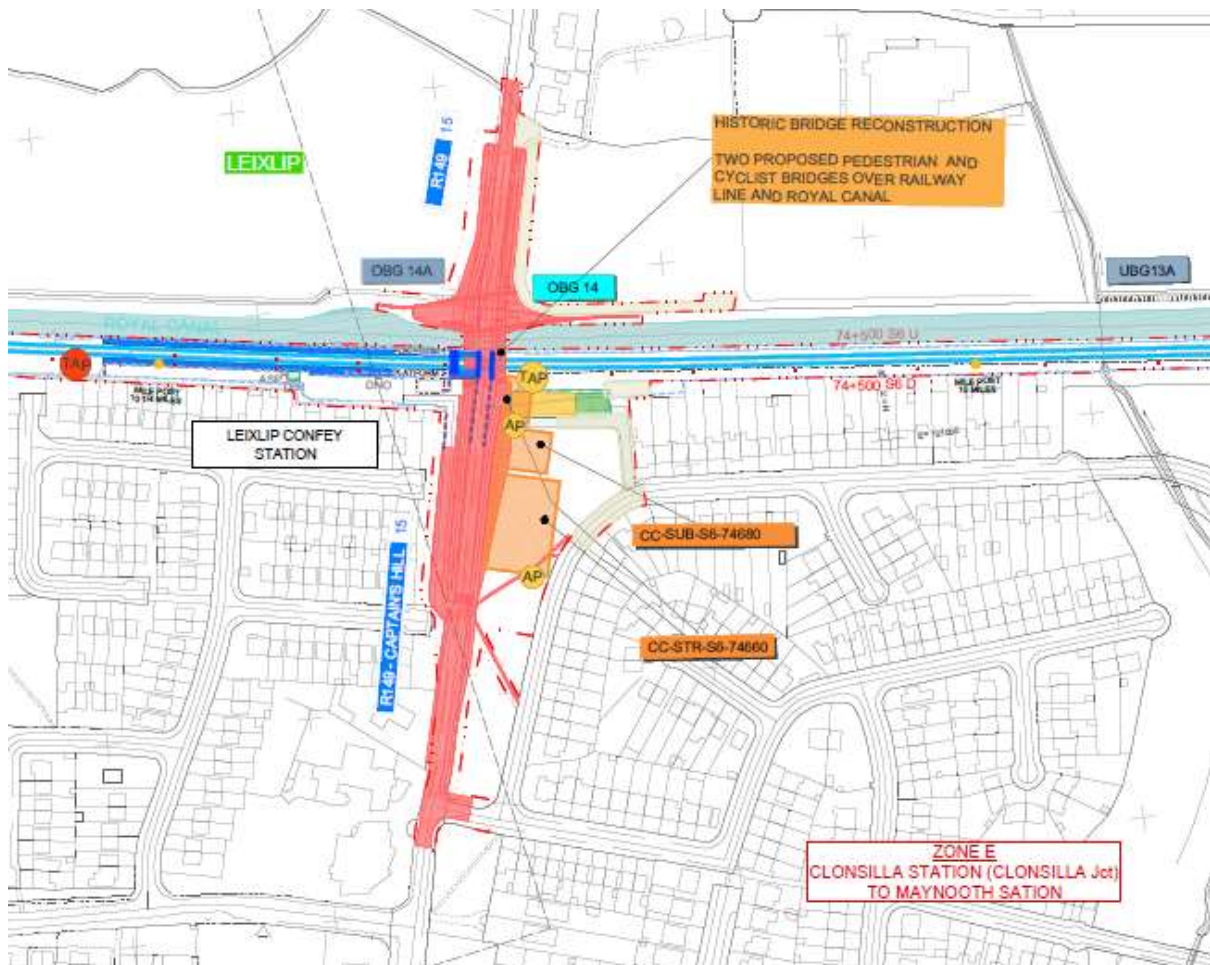
the canal west of the bridge. This has undergone other construction work over recent years, and we believe the owner of that land could be approached and may be very willing to accommodate a construction compound. This would be far more suitable as the impact on local residents would be minimal, and safety for road users and residents should not be compromised.

The use of this land for construction can be seen using the satellite imagery from Google Maps – as outlined in red:



We also note that there is inconsistency in the amount of greenspace proposed to be used for the construction compound with a far larger area shown in blue in the above drawing (from Book 2 Property Plans Part 2), than is shown in PROPERTY PLAN NO: DW.028 from Appendix B Proposed Development Drawings which shows the area in orange as the construction compound. Both however impact considerably on the greenspace and block at least one if not both of the access paths which the residents use to access the train station, Confey GAA Club and Confey graveyard.

Either would be materially damaging to the area and the residents and both proposals contradict Policy OS 1 of the Leixlip LAP which states that “It is the policy of the Council to provide for a hierarchy of high quality multi-functional public open spaces within Leixlip, and **to preserve and protect such spaces** through the appropriate zoning of lands”, as well as not meeting the criteria stated in Section 5.1, of the Non-Technical Summary to “Avoid, mitigate and if not possible reduce the adverse effects on communities during the construction of the project.” The proposed location and extensive scale of the construction compound seek to attain maximum adverse effect on us and other residents.



Overall, we believe there are a number of issues with the current construction plan around Cope Bridge and Glendale Estate, all of which can be resolved by the reduction in size or omission of the east footbridge, the relocation of the construction compound to a non-residential area, and the maintenance of single-lane controlled traffic flow over the bridge.

### Observation Process

We welcome the opportunity to review the proposed plans and to contribute to the planning process. However, we have been informed by another resident that during a meeting between Catherine Murphy (TD) and representatives from Irish Rail to discuss the Dart+ West project, a representative from Irish Rail stated that the plans are a “done deal”. If this is the case then it eradicates the public consultation process, and makes our submission null and void. It is disappointing to hear that such a comment would be made, given that the process is meant to be open to the public, and those who will be most affected by it, personally.

We hope that what we have heard is not true and that the process is transparent and democratic as it is intended to be.

### Conclusion

In conclusion, we have identified a number of areas of the proposal that if approved would materially harm us and our neighbours as residents as well as our local biodiversity. We believe that in each case,



there are alternative solutions, as we have identified, and that such amendments would enhance the overall works.

As regular users of the train station at Leixlip Confey since it opened, we welcome improvements to the service for the benefit of all residents. However, we do not believe that this should be done without due consideration to the residents who have supported the development of the local transport system from when none was provided.

The proposed development will be permanent, as will its impacts both positive and negative. It is therefore important to ensure that the development is undertaken with the best interests of residents and the environment. This is in line with stated objectives of the Government, the Council and CIÉ.

The green space at Glendale Estate is an important residential amenity which has been cared for and maintained by the residents for over 40 years at their own cost and time. While not noted as occupiers of the land in the Schedules, this is effectively the case. The maintenance of this space as greenspace is of fundamental importance to the health and wellbeing of residents and to the environment. One of the reasons to electrify the railway line is to provide a greener more sustainable transport solution. This objective should equally apply to associated works such as the building of the substations and the period of construction. However, for the proposals at Leixlip Confey, this is currently not the case.

It appears that the current proposal is based on the easiest option rather than the best option.

We therefore urge An Bord Pleanála to carefully consider every aspect of the proposal, how it is planned to be implemented and the permanent impact it will have, and to seek to implement enhancements in order to reduce or even remove the serious negative implications currently envisaged.

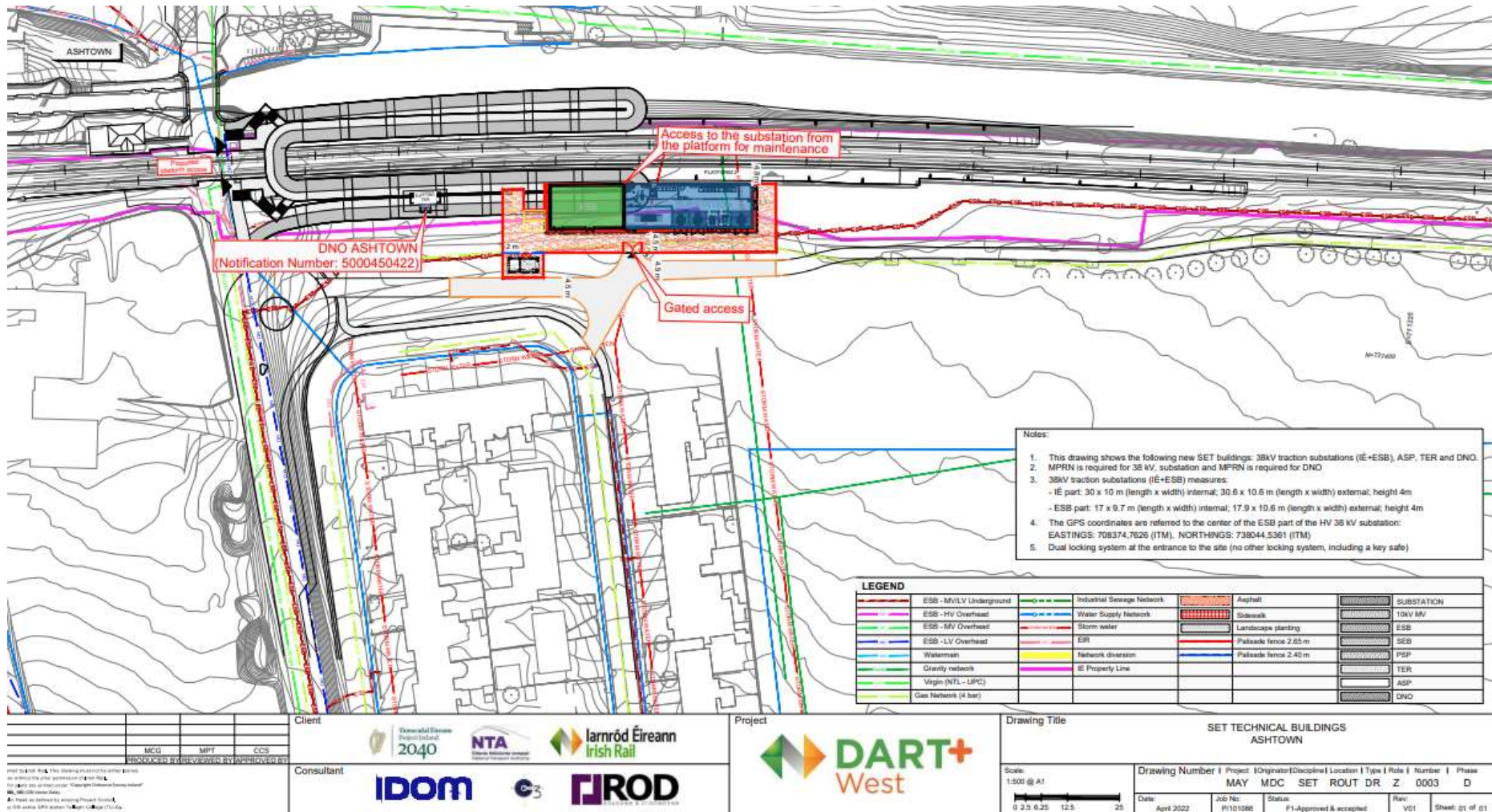
We thank you for taking onboard our comments.

Yours sincerely,

Kay & John Brennan

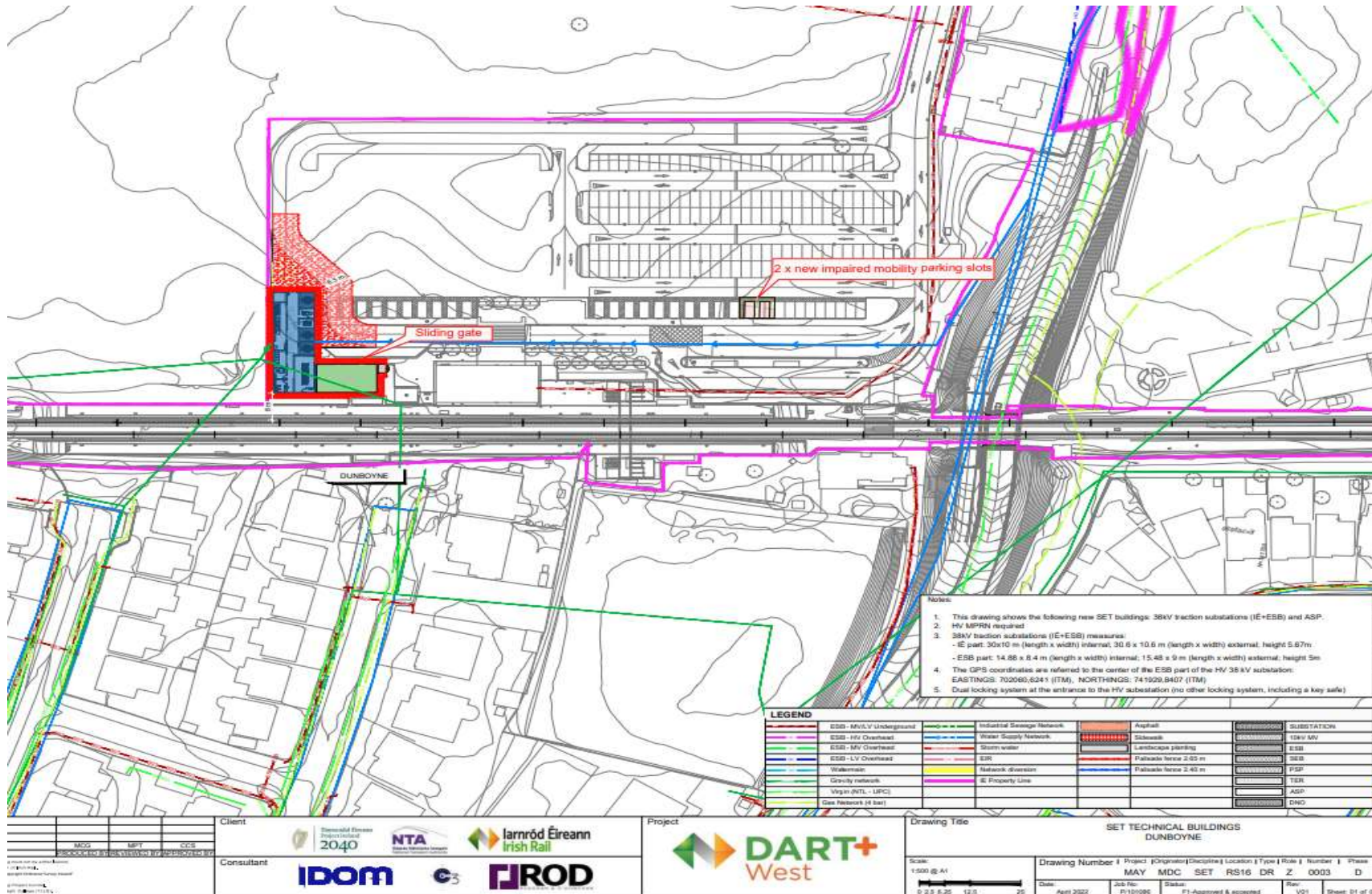
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## Appendix I



Extract from MAY MDC SET ROUT DR Z 0003 D which shows access to substation from the platform which could also be done at Leixlip Confey station.





Extract from MAY MDC SET RS16 DR Z 0003 D which shows an L-shaped substation which could also be considered for Leixlip Confeys station.



Extract from MAY MDC SET RS14 DR Z 0003 D which shows that the path is not required on all 4 sides as was identified as a requirement for the substation at Leixlip Confey station.