

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Date: 25/10/2022
Our Ref: SGB JN 19203

Dear Sir/Madam,

**RE: Submission to DART + West
Electrification Railway Order 2022**

On behalf of our client, St. Patrick's College Maynooth, we hereby make the attached submission in respect of the above Railway Order application.

We enclose a cheque for €50.00 to cover the submission fee, as set out in the public notices.

Please acknowledge receipt of same.

Yours faithfully,

John Spain Associates

John Spain Associates.

AN BORD PLEANÁLA	
LDG-	058521-22
ABP-	
25 OCT 2022	
Fee: €	50.00
Type:	cheque
Time:	16.43
By:	hand

Yours sincerely,

A handwritten signature in black ink, appearing to read "John Spain". The signature is written in a cursive, slightly stylized font.

John Spain
Managing Director John Spain Associates Ltd.

**Submission to DART + West
Electrification Railway Order 2022**

On behalf of

St. Patrick's College Maynooth

To

An Bord Pleanála, 64 Marlborough Street, Dublin 1

October 2022

JSA John Spain Associates
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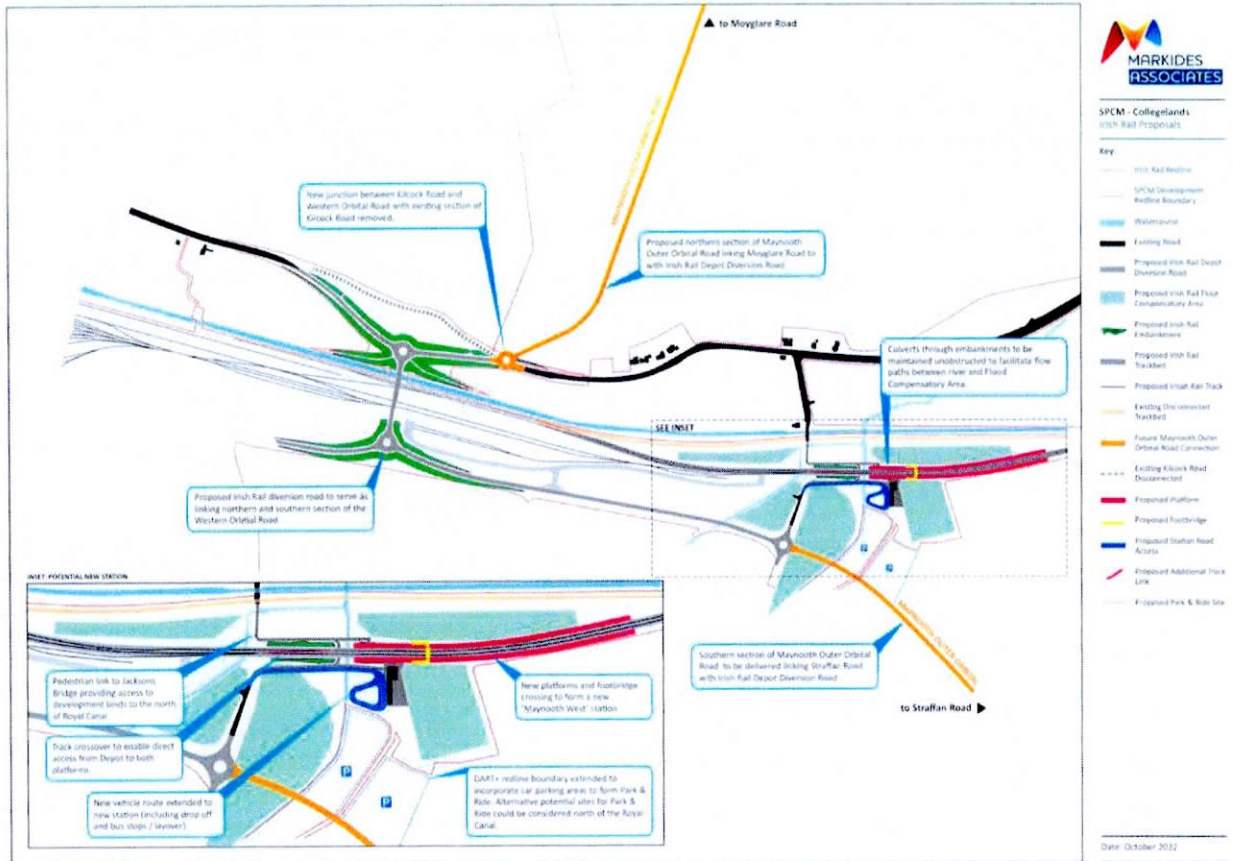
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EXECUTIVE SUMMARY

- St. Patrick's College Maynooth welcomes the Railway Order application for the upgrade of the railway service to Maynooth. Currently many of the College's & Maynooth University's students and staff avail of the train service at Maynooth station.
- The College anticipate that an enhanced railway service will support and assist its long-term growth plans within the expanding town of Maynooth. It will also help to reduce private vehicular traffic congestion in Maynooth town centre.
- We note that the Regional Spatial & Economic Strategy (RSES) for the Eastern & Midland Region states that most of the future growth of Maynooth will be to the north, west and southwest of the town.
- The draft Transport Strategy for the Greater Dublin Area (GDA) 2022-2042 published by the National Transport Authority, includes the objective for a second railway station to be located to the west of the town centre, together with an associated Park & Ride facility.
- The Draft Kildare Development Plan 2023-2029 also supports the future provision of a railway station and park & ride facility to the west of the town centre, as most recently published in the proposed Material Amendments.
- Kildare County Council and Meath County Council have commenced the preparation of a Joint Local Area Plan (LAP) for Maynooth and its environs. As part of the Joint LAP process an Issues Paper was recently published, this document identifies the provision of an additional train station west of Maynooth ('Maynooth West Station'), together with a number of other major transport infrastructure projects.
- The Maynooth Local Area Plan (LAP) also includes provision for a future Maynooth Outer Orbital Road that will cross over the Dublin-Sligo railway line and the Royal Canal. This important new circulatory road could provide convenient access to a new railway station on the western side of the town, as well as providing access to the proposed DART depot site. It could also enable a Park & Ride facility to be provided at the station, which would facilitate further access to train services from the wider area of north Kildare and southern Meath, as well as along the M4 corridor west of Maynooth.
- There is an opportunity now to provide for an integrated approach between transport planning and land use planning, and in particular the planning framework provided by the RSES, by providing for an additional station "Maynooth West" between the existing station and the proposed new depot, together with the associated park & ride facility.
- It is respectfully submitted that the DART + West expansion to Maynooth project should respond to the new planning framework set out in both the draft Transport Strategy for the GDA 2022-2042 and the draft Kildare County Development Plan 2023-2029, both of which will be finalised and adopted before the Board reaching a decision on this Railway Order, and demonstrate complementarity of the proposed design with the planned Maynooth West trains station, its associated park & ride facility and the planned Maynooth Outer Orbital Road.

- The diagram below Figure A demonstrates indicatively how a future Maynooth West station could be accommodated on the proposed realigned tracks adjacent to Jackson's Bridge, without requiring any significant modifications to Irish Rail's design proposals.

Figure A: Indicative Layout for Proposed Maynooth West Train Station



- Therefore, we would respectfully request that Irish Rail would be requested to demonstrate to the satisfaction of the Board that their plans can accommodate for a future station and park & ride facility in the design and that this be conditioned in the Railway Order in order to ensure that the project is consistent with the emerging planning policy framework for Maynooth, including the draft NTA's GDA Transport Strategy 2022-2042, the draft Kildare County Development Plan 2023-2029, and the emerging Joint Maynooth Local Area Plan. Such design will also need to demonstrate full integration with the necessary flood compensatory measures required for this area.
- It should be noted that the provision of a new Maynooth West station would in fact enhance the business case for the DART + West project, as it would lever a greater return on the investment and support the proposals for the future intensification of land use to the north and west (at Collegelands south /north).
- We note that the proposed DART + West plans do not make any provision for the Maynooth Outer Orbital Road, which is a specific objective of the Maynooth LAP 2013-2019. This roads objective is maintained in the published draft Kildare County Development Plan 2023-2029 and 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 highly important that the DART + West proposals ties in with the statutory plans for the area and the key infrastructure objectives contained within, including the Maynooth Outer Orbital Road.

- The current proposals for DART + West include provision for the construction of a new bridge over the Royal Canal and rail line so as to provide access to the proposed new DART depot west of Jackson's Bridge. Again, there is significant opportunity to combine these proposals by CIÉ/Irish Rail with the specific roads objectives of Kildare County Council of a new Outer Orbital Road planned for the western side of Maynooth. Rather than having two separate bridge crossings of the canal and railway line, an opportunity now presents itself to combine both objectives to deliver a suitably designed single bridge crossing.
- We would respectfully suggest that such an approach would not require significant amendments to CIÉ/Irish Rail's current proposals. However, it would require the road and associated infrastructure, including junctions, road specification and bridge deck, to be constructed with the future use of this link as part of the Maynooth Outer Orbital Road in mind.
- There is an opportunity to re-route the existing high voltage electricity line which traverses our client's lands as well as crossing Irish Rail's property in the vicinity of the proposed realigned track to east of Jackson's Bridge to a more advantageous location for both Irish Rail and St. Patricks College, such as along the route of the Outer Orbital Road.
- The suggested amendment to plans are necessary to ensure that the DART + West proposals are compatible and integrate with the existing and emerging statutory planning framework, policies and objectives for Maynooth.
- A number of queries are raised in respect of proposed temporary and permanent acquisition of our clients' lands to facilitate the proposed works covered by the Railway Order.

1.0 INTRODUCTION

- 1.1 We refer to the application by Córas Iompair Éireann (CIÉ) to An Bord Pleanála for a Railway Order for the DART+ West project. Subject to approval, the DART+ West Railway Order will authorise CIÉ to carry out railway works between Dublin City Centre and Maynooth, and includes a new maintenance depot to the west of Maynooth (County Kildare) and which invites submissions from interested parties until the 28th October 2022.
- 1.2 Our client, St Patrick's College Maynooth (SPCM), welcomes the opportunity to make a submission on the Railway Order for the DART + West line. Maynooth is a very important university and commuter town. 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.
- 1.3 This submission focuses primarily on proposals as they relate to the town of Maynooth, and in particular the need for an integrated approach between DART + West and the new station plans foreseen for Maynooth and to future proof for the proposed significant growth in the town's population planned for under the government's national development strategy - Ireland 2040 (National Planning Framework and the National Development Plan). The submission makes a number of specific proposals on how the proposed DART + West application could be further enhanced and integrated with wider land use and transportation plans for Maynooth.
- 1.4 This submission builds on and should be read in conjunction with an earlier submission made by SPCM to Irish Rail in September 2021 on the emerging preferred options.
- 1.5 In addition, SPCM have also made a submission in regard to the Draft Kildare Development Plan 2023-2029 which is currently at Material Amendment stage and under preparation.
- 1.6 A central tenant of this submission is that the current proposals from CIÉ/Irish Rail must be considered and assessed in the context of the existing and emerging regional and local planning policies, and that there is a need to future proof the current proposals to ensure consistency with such planning policies.

2.0 NATIONAL & REGIONAL PLANNING POLICY CONTEXT

National Planning Framework

- 2.1 In December 2019 the Government published its development framework for the spatial development of the country out to 2040 under the National Planning Framework (NPF).
- 2.2 National Policy Objective 33 seeks to *'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'*.
- 2.3 According to the NPF, the population of Ireland is expected to increase by more than a million people to around 5.6 million by 2040, of which the Eastern & Midland Region is expected to grow by up to 540,000. This will require an additional 320,000 jobs to be created in the Region. The NPF also identifies that there is a growing need for housing provision in the country with between 25,000 and 30,000 new homes required to be provided every year to meet people's needs for well-located and affordable housing. This is reinforced by the Government's recent housing initiative titled 'Housing for All', which sets a target of 33,000 housing units per annum nationally up to 2030.

Regional Spatial & Economic Strategy

- 2.4 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.
- 2.5 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).
- 2.6 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 1: Dublin MASP



Figure 5.2 Dublin Metropolitan Area Strategic Plan

- 2.7 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. This is particularly relevant for Maynooth.

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 line /DART)	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 Total 37,000	Leixlip - strategic greenfield lands near Conely 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
	Maynooth - Significant strategic residential capacity at Railpark lands and to the north and west of the town near Maynooth University	New Research & technology Park adjoining Maynooth University	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

- 2.8 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.
- 2.9 In summary, Maynooth has been identified in the RSES as a Key Metropolitan Growth Centre located on the North-West Strategic Corridor in the Regional Strategy and is targeted to grow significantly over the next decade, with most of this growth occurring to the west and north of the town.
- 2.10 Furthermore, the Metropolitan Area Strategic Plan (MASP) for Dublin recognised that not all of Dublin city’s planned population growth is likely to happen in the short term. However, the scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026, and that this level of transfer may be determined at the regional or metropolitan level. The MASP identifies that *‘this shall apply only to the three Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors.’*
- 2.11 Such a scenario has now come to pass and in July 2020 the Eastern & Midland Regional Assembly formally passed a resolution allocating an additional 10,000 to the population target for Maynooth to 2031.
- 2.12 This level of population growth will have significant impacts on the existing and planned upgrades to the Maynooth railway line, and, as will be outlined below, suggests that a new DART station to the west of the town, where most new housing is likely to be developed, should now be actively planned for as part of the DART + West proposals.

New & Emerging Regional and Local Planning Policy Framework

- 2.13 During the time when Irish Rail have been developing their plans for the electrification of the rail line to Maynooth under DART + West, a new and emerging planning policy framework has also been under preparation at both regional and local level, which we would respectfully suggest has not been adequately addressed in this Railway Order application. In particular we would refer to the draft Transport Strategy for the Greater Dublin Area 2022-2042 published by the National Transport Authority (NTA) in 2021, and the draft Kildare County Development Plan 2023-2029 published by Kildare County Council in 2022, both of which are likely to be finalised and adopted prior to the Board making a decision on this Railway Order application.
- 2.14 Kildare and Meath County Councils have also recently published an Issues Paper as part of their preparations for a new Joint Maynooth Local Area Plan, which will replace the now expired Maynooth LAP 2013-2019. It is anticipated that a draft Maynooth LAP 2023-2029 will be published by the two Councils in H1 2023.
- 2.15 The policies and objectives contained in these new regional and local plans, do have significant implications for the DART + West project, as we will demonstrate in the following section, and we would respectfully request that the Board would give due consideration to these new plans in assessing the current proposals contained in the Railway Order application.

Draft Greater Dublin Area Transport Strategy 2022-2042

- 2.16 In November 2021 the National Transport Authority published its draft Transport Strategy for the Greater Dublin Area (GDA) 2022-2042, which will, when finalised, replace the current 2016 – 2035 strategy. This new Transport Strategy has been framed in the context of the new planning policy environment created by the National Planning Framework 2018 and the Regional Spatial & Economic Strategy for the Eastern & Midland Region 2020.
- 2.17 While the draft transport strategy is fully supportive of the DART + West project, it is important to recognise that this updated strategy does contain the identification of a number of other infrastructural projects, which directly interface with the DART + West project, and thus need to be fully assessed as part of this Railway Order application.
- 2.18 These include under measures relating to rail the following objective:
*“Measure RAIL6 – New Rail Stations
 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.”*
- 2.19 From this it is clear that it is a specific objective of the NTA that a new rail station is to be developed to the ‘west of Maynooth’. Given this objective, it is critical that the current design for the electrified and realigned track to the west of Maynooth, as included in this Railway Order application, explicitly addresses this objective and makes provision for this proposed new train station. At present the submitted drawings and accompanying reports do not make any reference to this objective for a new station to the west of Maynooth.
- 2.20 Accordingly, we would respectfully request that the Board would request CIÉ/Irish Rail to demonstrate to the satisfaction of the Board, either how a new station could be accommodated within the existing plans for DART + West as submitted, or how the plans can be modified to so accommodate the station, including vehicular and pedestrian access arrangements.
- 2.21 The draft Transport Strategy also contains a specific measure to develop further park & ride facilities as follows:
*“Measure INT3 – Park & Ride
 It is the intention of the NTA to secure the development of a network of regional level bus and rail based Park and Ride facilities in the GDA at appropriate locations where the national road network meets, or is in close proximity to, high capacity bus and rail services.”* Accompanying this measure is a diagram (Figure 9.1) which identifies lands adjacent to the proposed DART depot to the west of Maynooth as a potential site for a rail-based park & ride facility of up to 1,000 spaces.
- 2.22 This objective has also not been referenced in the Railway Order documentation, and we would again respectfully ask that the Board would have regard to this objective in its assessment of this Railway Order application, to ensure that the future delivery of this park & ride facility is not prejudiced by, but is facilitated by the DART + West plans.

The Draft Kildare Development Plan 2023-2029

- 2.23 Kildare County Council is currently at an advanced stage in the preparation of a new Kildare County Development Plan 2023-2029, which when adopted in Q1 next year will become the new statutory development plan for the county. The draft Development Plan was published in March 2022 and following the public display period and

preparation of Chief Executive's report, the members of Kildare County Council decided to make a number of proposed material amendments.

- 2.24 The Proposed Material Alterations to the Draft Kildare County Development Plan 2023-2029 were agreed by the Council and published 28th September 2022. The public consultation period on these proposed amendments is open until the 27th October 2022. It should be noted that the Material Alterations include reference to 'Collinstown or Maynooth railway station/depot sited to the west of Maynooth including a park and ride facility'.

- 2.25 Objective TM O46 is proposed to be amended, as follows:

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 including DART+:

- *A second ~~New Sallins & Naas~~ railway station sited to the west of the existing station in Sallins, including a park and ride facility (1 000 spaces).*
- *Collinstown or Maynooth railway ~~Station/Depot~~ sited to the west of Maynooth including a park and ride facility (1 000 spaces – 500 initially); and*
- *a Kill park and ride facility - bus based (500 spaces).*

- 2.26 Within the CE Report (page 335 of the CE Report on submissions received on the Draft Development Plan) the delivery of the proposed Maynooth West train station is supported when it states the following:

"The request to include a specific objective relating to the provision of a future railway station is accepted. It is considered that the insertion of such an objective would align with Measure RAIL6 – New Rail Stations of the National Transport Authority's Draft Greater Dublin Area Transport Strategy 2022-2042."

- 2.27 In regard to the improvement of public transport in the area, it should be noted the proposed amendment to Objective TM O9 as follows:

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+ Southwest), BusConnects and the light rail investments. The DART+ projects present an opportunity to improve journey time, reliability, and train frequency.

- 2.28 We note that the Chief Executive (page 51 of the CE Report on submissions on the Draft Development Plan) states the following:

It is considered acceptable to reference the opportunity presented by the DART+ projects to improve journey time reliability and train frequency in Objective TM O9. In relation to the submission that the draft Plan should provide support to the measures required for the successful implementation of DART+, it is considered that objective TM O9 adequately addresses this issue

- 2.29 Overall, the CE considers the reference to the DART + proposals as appropriate and aims to support its successful implementation.

- 2.30 Based on the foregoing it is clear that the proposed new Kildare County Development Plan 2023-2029 will include specific objectives to supply the delivery of both a new train station to the west of Maynooth town and an associated train-based park & ride facility nearby, and therefore we would respectfully suggest that the Board must have

regard to this local planning policy. When it comes to assess the current proposals for the DART + West project as contained in the current application before the Board, it is anticipated the Kildare County Development Plan 2023-2029 will be adopted prior to the Board making a decision on the Railway Order application.

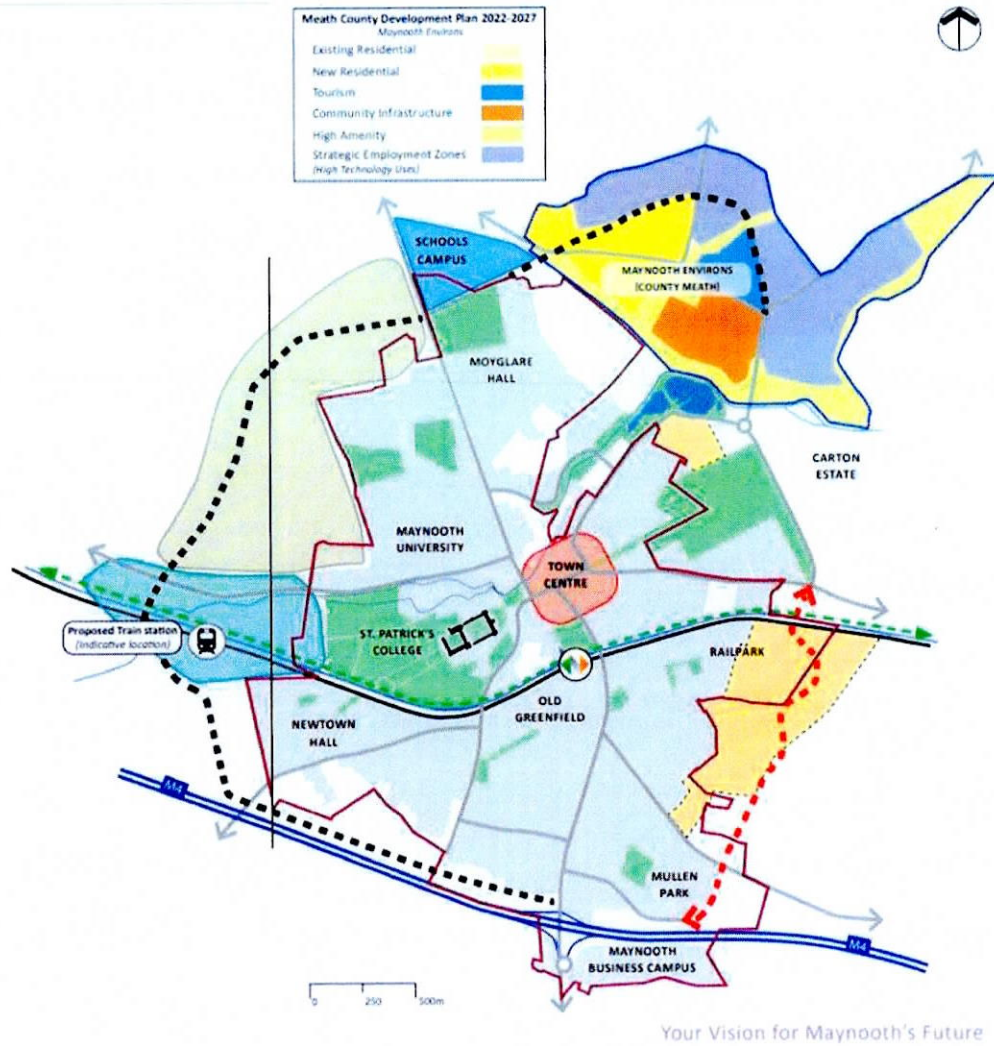
Maynooth Local Area Plan (LAP)

- 2.31 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.
- 2.32 As a stage 1 to the preparation of this LAP the two Councils have recently prepared an Issues Paper which is intended to prompt general discussion on key areas to support the preparation of the LAP including key challenges for Maynooth and key questions. This Issues Paper is currently on public display until the 28th October 2022.
- 2.33 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.

- 2.34 The Issues Paper includes a diagram (see figure 2 below) to illustrate the emerging future development strategy for Maynooth. We note that a significant new 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'. St. Patrick's College is a significant landowner in this area of Maynooth, and the College is supportive of the approach set out.
- 2.35 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 new Transport Strategy for the GDA 2022-2042.
- 2.36 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 is so far as they relate to that section dealing with Maynooth town. In this regard we set out in the following section how the local planning policies and objectives

**Key**

Key Routes	—	Settlement Boundary (CSO, Census 2016)	—
Railway Line	—	Undeveloped lands currently zoned for New Residential (KCC)	—
Maynooth Train Station	🚂	Potential Transit-Oriented Development site	—
Royal Canal Greenway	—	Identified location for future Economic and Residential Development	—
Maynooth Eastern Ring Road	—	Maynooth Environs (County Meath)	—
Maynooth Outer Orbital Road (MOOR) - Indicative Route	—		

Figure 2: Proposed Development Strategy, Joint Maynooth Issues Paper, Kildare & Meath County Councils, 2022.

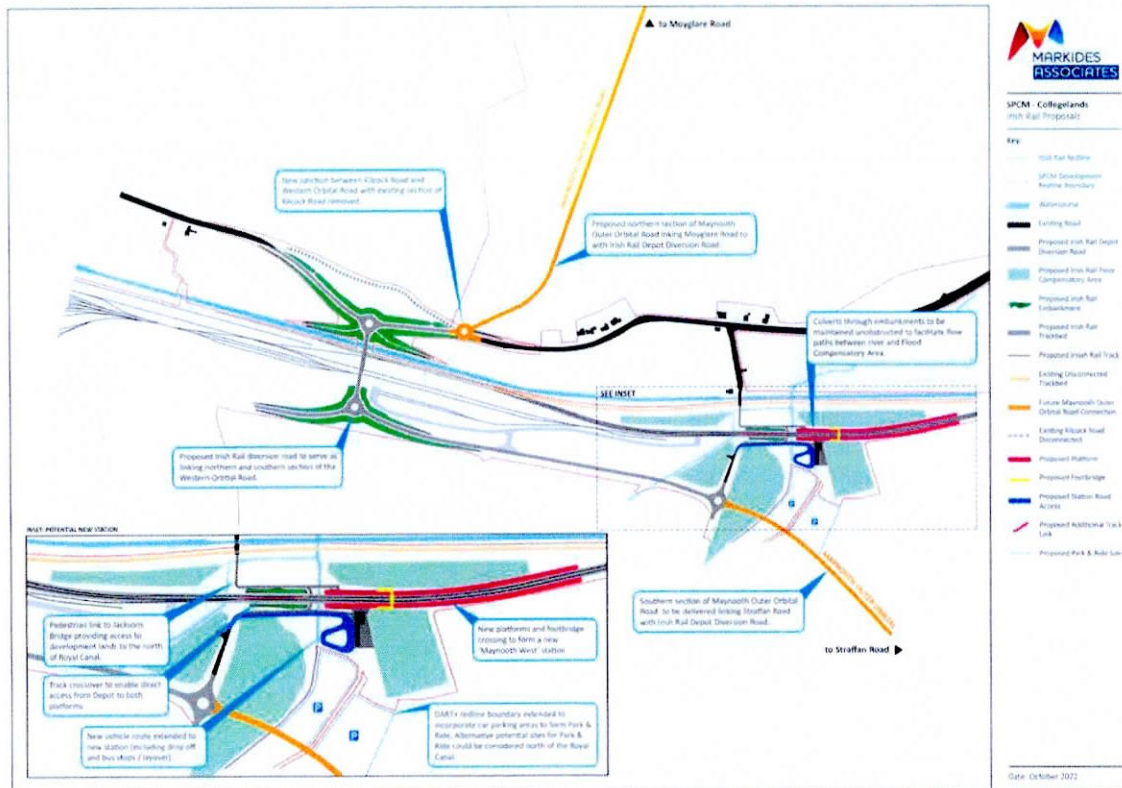
3.0 FUTURE PROOFING DART + WEST PROPOSALS

Maynooth West Railway Station

- 3.1 The need for full integration between land use planning and transportation planning is well established. In order to ensure there is full co-ordination between plans for the future development of Maynooth Town and the future provision of infrastructure, including public transport. Given the proposed DART + West line extending to a new depot to the west of Maynooth, and the identified need for significant residential and employment provision to the west of the college and university in the Regional Strategy, there is now the opportunity to maximise the benefits of this investment in the DART + West project by integrating it more fully with other proposed transport infrastructure in the area and with spatial plans for the future development of Maynooth.
- 3.2 The proposed double tracking and diversion of the railway to the west of Maynooth presents a unique opportunity to support the expansion of the town of Maynooth which is identified within the national and regional planning documents. The land to the west of Maynooth which has already been identified for development in the current statutory planning framework (the RSES), is located between 1km and 2.5km of the existing Maynooth station. The Irish Rail proposals however would put the land within between 0.2km and 1.9km of the upgraded and electrified railway line, with a substantial majority of the land being within a 1km radius of the upgraded and realigned railway line.
- 3.3 Accordingly, we believe that there is a significant opportunity to deliver a new station on the proposed realigned railway that would provide optimal accessibility to the lands that are identified to accommodate future growth.
- 3.4 Whilst we would not expect a new station to necessarily be delivered as part of the CIÉ/Irish Rail current proposals, we would respectfully suggest that there is a very strong case to ensure that the design of the DART + West project safeguards, or at the very least does not prejudice, the ability for a new station to be constructed in this location at a later date to ensure that the DART + West project is consistent with the current and emerging planning policy framework for Maynooth. This, we would respectfully suggest, has not been addressed by CIÉ/Irish Rail in this application, and is a matter which we respectfully request that CIÉ/Irish Rail be required to address this issue and demonstrate compliance.
- 3.5 To assist the Board in this regard, Figure 2 prepared by Markides Associates shows how, using the application material provided by CIÉ/Irish Rail, a new station could be constructed on the diverted section of the railway with two platforms constructed to Irish Rail standards, alongside means of road access from the south and pedestrian / cycle access from the north. At a minimum, we would respectfully request that the Board should seek from CIÉ/Irish Rail engineering 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 platforms as shown in Figure 3, and that the necessary land for the delivery of such a station and associated park & ride facility, is included within the proposed Railway Order.
- 3.6 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.

Figure 3: Indicative layout of proposed Maynooth West Train Station & integration with proposed Maynooth Outer Orbital Road



Park & Ride

- 3.7 There are a number of known issues relating to the existing car park at Maynooth station and it is understood that Irish Rail have exhausted all options to provide any additional car parking space within the vicinity of the existing station. This constrains the potential passenger ridership at the station, and it is well documented that demand for additional car parking exists. Meanwhile, the car parking area at the existing station dominates what is a relatively prominent town centre site located immediately adjacent to the Royal Canal, and could potentially become a prime site for development for more sustainable town centre uses if the demand for car parking was addressed elsewhere.
- 3.8 A new Maynooth West station presents an opportunity to resolve this issue also by providing a new fit for purpose station car park reducing the reliance on the town centre station car park and potentially opening it up for other uses. Meanwhile, a new station car park at Maynooth West would be accessible by car without travelling through the centre of Maynooth, thereby reducing traffic on the local road network which in peak periods is characterised by significant congestion. With a new car park to the west of Maynooth, those existing trips would be diverted to the periphery of the town via new purpose built roads, a particular benefit for those trips originating from elsewhere along the M4.

- 3.9 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.
- 3.10 Therefore, we would consider it imperative that the CIÉ/Irish Rail's proposals should be assessed in terms of their compatibility with the National Transport Authority's plans for a Park & Ride facility to be delivered adjacent to the upgraded DART line in the vicinity between the proposed new train station and the DART depot. Figure 3 above illustrates how potentially such a park & ride facility could be integrated with the DART + West proposals, although other options may also be available in terms of the siting of this parking area, regard being had to the flood compensatory measures.

Maynooth Outer Orbital Road (MOOR)

- 3.11 As outlined above, significant transport infrastructure will be required in the medium term to serve the scale of development which will be necessary to meet the population projections for Maynooth. In this regard it should be noted that the 2013-2019 Local Area Plan (LAP) for Maynooth identifies within its Road Objective's Plan, shown in Figure 4, a Western Orbital Road (WOR) which involves linking the Moyglare Road in the north of Maynooth with the M4 to the south of Maynooth. The WOR would be required to cross both the existing rail line and Royal Canal to the west of Maynooth in the approximate location of Jackson's Bridge.
- 3.12 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).

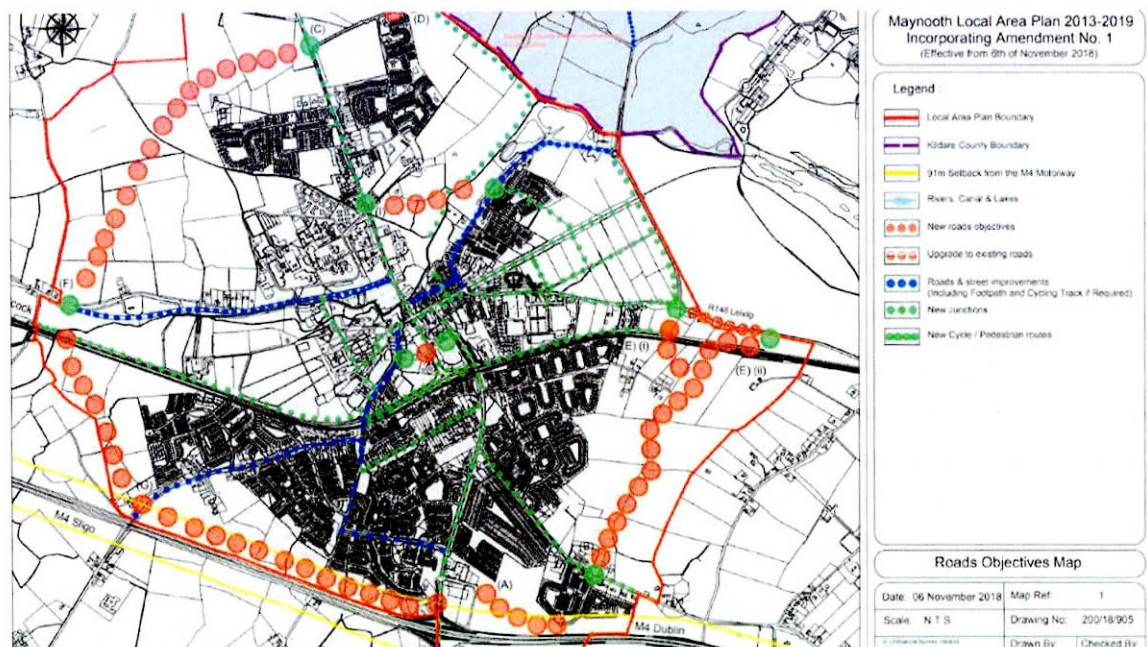


Figure 4: Transport Objectives for Maynooth as contained in Maynooth LAP

- 3.13 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.
- 3.14 The CIÉ/Irish Rail proposals for the realignment of the rail corridor and the location of the rail depot highlight a number of key land use planning issues that should be considered as an integral part of the westward growth and future planning of Maynooth in the years ahead.
- 3.15 It is understood that the railway, as it diverts to the south of its existing alignment at Jackson's Bridge, will be constructed upon an embankment to address issues associated with flood risk. This will result in the diverted railway being at a higher level, understood to be approximately 3m higher than the current railway alignment which goes underneath Jackson's Bridge at approximately the same level as the Royal Canal. Raising the railway in this location has significant consequences relating to the delivery of MOOR as it is understood that any new vehicular route crossing the railway would require a circa 5m clear head height from track level. Taking into account that the MOOR would also be required to bridge over the Royal Canal, this would result in:
- A significant bridge structure spanning the railway and the Royal Canal;
 - A bridge deck across the railway circa 5m above track level which itself would be circa 3m above existing ground level; and
 - A significant volume of earthworks which would be required to provide ramps to any future bridge deck at circa 8m above existing ground level.
- 3.16 Such a vehicle bridge would be a significant piece of infrastructure with potentially significant consequences for the local environment with a wide range of impacts. Given the clear implications of the Irish Rail proposals for the Maynooth Outer Orbital Road, we respectfully suggest that the proposals do not fully take into account the transportation objectives of the Draft Kildare County Development Plan 2023-2029 and the Maynooth Local Area Plan 2019 and have yet to appreciate the consequences of not fully considering how the Orbital Road would cross the new railway.
- 3.17 As clearly demonstrated above, there would be numerous challenges in delivering the MOOR in its current alignment if the CIÉ/Irish Rail current proposals are delivered. However, we believe that there is an opportunity to align the proposals by safeguarding elements of the infrastructure already proposed to become a link within the future orbital road.
- 3.18 The Irish Rail proposals provide a road crossing over the railway further to the west of Jackson's Bridge. Whilst it is understood that this is proposed as a replacement to the existing L5041 across Jackson's Bridge which would be severed following construction of the railway, we would suggest that this crossing incorporates the future technical requirements of the Maynooth Outer Orbital Road, so that it can serve as both the replacement of the L5041 and the future MOOR.
- 3.19 This would necessitate a realignment of the orbital road from that identified within the 2013 LAP, however it would be an opportunity to deliver the critical part of the Orbital Road, enabling future connections from the north and south as and when required to support development to the west of Maynooth. Figure 3 above illustrates how the MOOR could be delivered, aligned with the current CIÉ/Irish Rail's road proposals. There also may be the opportunity to re-route the existing high voltage power line

which traverses both St. Patricks College and CIÉ/Irish Rail lands to a more advantageous location, such as along the route of the Orbital Road.

- 3.20 We believe that this would not require significant amendments to Irish Rail's current proposals. However, it would require the road and associated infrastructure, including junctions, road specification and bridge deck, to be constructed with the future use of this link as part of the MOOR in mind. An integrated approach to the delivery of the MOOR between CIÉ/Irish Rail, Kildare County Council and adjacent landowners such as SCPM, would significantly enhance the proposals and avoid the costs and risks of delivering a second bridge across the railway and Royal Canal, which we believe, as a result of the impacts detailed above, present significant risk to future delivery. Any risk to delivery of the Maynooth Outer Orbital Road, equally risks the delivery of the development required to the west of Maynooth to meet increasing population projections. Whilst we fully support the principle of DART + West, it is critical for the future of Maynooth, that the proposals tie in with the existing and emerging planning framework for Maynooth and support rather than compromise the ability to deliver the town's planned future growth.
- 3.21 Accordingly, we would respectfully request the Board to invite CIÉ/Irish Rail to modify its current design for road access to the proposed depot involving an overpass over the canal and rail line so as to fully integrate with the delivery of the Maynooth Outer Orbital Road, along the lines as shown on Figure 3.

4.0 LAND ACQUISITION MATTERS

- 4.1 Parts of our clients' lands have been identified in the Railway Order documentation as being sought to be acquired, either temporarily or permanently, to facilitate the proposed railway works. Our clients have a number of queries in relation to same, as set out below. Further queries and issues may arise as more information becomes available, and our client reserves the right to raise further matters at CPO stage.

Permanent Acquisition Areas

1. Further clarity is needed in relation to the precise nature of the works that are being carried out along the public road and area of land that is being acquired permanently. In particular, clarity will be needed in relation to the levels of the new road and the design of the new road.
2. Clarity will be needed in relation to the future ownership of the lands that are being acquired. In particular, will the lands be all in the ownership of Kildare County Council and will they all be designated as public road? Please also clarify in relation to this matter whether there will be any third party private ownership or ownership by CIE of any strips of land along the public road?
3. There is a permanent acquisition plot DW.038 - P.93(A) that is being acquired in relation to an ESB Pylon/Mast. Why has this mast location to be a permanent acquisition as that would not be the standard practice in relation to electric lines? Will this plot be owned by ESB?

Temporary Areas

1. In relation to the various temporary areas, can the acquiring authority please confirm that all of the temporarily used lands will be returned to the owners in an equivalent or better state than existed prior to the works with no change in the existing legal status and no additional burdens on the title?
2. When is it envisaged that the works on the temporary acquisition areas will commence and what is the expected duration of the works?

5.0 CONCLUSIONS

- 5.1** St. Patrick's College Maynooth welcomes the 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. 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. In this context the catchment area of the existing railway station will be stretched to 2km, which is considerably further than the optimal 1km distance for convenient access to the train service.
- 5.2** There is an important opportunity to integrate the DART + West proposals with the current and emerging spatial planning framework for Maynooth, as set out in the RSES, the draft GDA Transport Strategy 2022-2042, the draft Kildare County Development Plan 2023-2029 and the Maynooth LAP Issues Paper and to improve the accessibility between the expanding urban area and the railway service through provision of a new western railway station.
- 5.3** In particular, both the draft Transport Strategy for the Greater Dublin Area 2022-2042 published by the NTA, and the draft Kildare County Development Plan 2023-2029 published by Kildare County Council contain specific objectives for a new train station and associated park & ride facility to be developed to the west of Maynooth town. Unfortunately, the current plans before the Board do not make reference to these projects.
- 5.4** We also note that the proposed DART + West plans do not make any provision for the Maynooth Outer Orbital Road, which is a specific objective of the Maynooth LAP 2013-2019. This roads objective is maintained in the published draft Kildare County Development Plan 2023-2029 and 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 highly important that the DART + West proposals ties in with the statutory plans for the area and the key infrastructure objectives contained within, including the Maynooth Outer Orbital Road.
- 5.5** It is evident that the DART + West Railway Order proposed by CIÉ/Irish Rail, has the potential without an integrated approach to spatial planning, to impact the delivery of further development to the west of Maynooth. Therefore, it is essential that the planning and design of the DART+ West proposals are integrated, as with any transport planning project, with land use planning of Maynooth town. Based on our current understanding of the proposals, we are concerned this level integration has not occurred to date.
- 5.6** It is respectfully submitted that the DART + West expansion to Maynooth project should respond to the new planning framework set out in both the draft Transport Strategy for the GDA 2022-2042 and the draft Kildare County Development Plan 2023-2029, both of which will be finalised and adopted before the Board reaching a decision on this Railway Order, and demonstrate complementarity of the proposed design with the planned Maynooth West train station, its associated park & ride facility and the planned Maynooth Outer Orbital Road, and that such additional elements are compatible with the flood compensatory measures required in this area.
- 5.7** These suggested amendments of the proposed development proposals present exceptional opportunities for integration of spatial and transportation planning. The key opportunities for integration with wider development priorities of the town that exist include:

- Safeguard and design for a location for a new railway station to the west of Maynooth on the proposed diversion of track in the vicinity of Jackson's Bridge;
- Safeguard and design for a location for a park & ride facility in the vicinity of the proposed depot and new station in Maynooth; and
- Safeguard and design for the proposed road crossing through the depot so that it can in the future become part of the Maynooth Outer Orbital Route.

5.8 The suggested amendments to the Railway Order can bring significant benefits to the future development of Maynooth, as well as improving the business case for the DART + West project itself.

5.9 We would be happy to elaborate further on these issues if that would be of assistance. Furthermore, we would be happy to further discuss and expand on the ideas put forward in this submission, should the Board decide to hold an oral hearing.

Yours faithfully,



John Spain
Managing Director

Indicative layout of proposed Maynooth West Train Station & associated Park & Ride facility and alignment with Maynooth Outer Orbital Road

