

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

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

Date: 25th October 2022

Re: Case reference: 314232 -Railway Order Application DART+ West Railway Order - Dublin City to Maynooth and M3 Parkway

Dear Sir/Madam,

I am writing to submit my observations on the DART+ West Electrified Railway Order 2022 (Case reference: NA29S.314232).

In particular, I'd like to raise concerns with the proposal for a substation on the green area at Glendale Estate in Leixlip, Co. Kildare; the proposed footbridges at Cope Bridge in Leixlip, Co. Kildare; planned changes to traffic management on Cope Bridge; and the planned location of the construction compound on the green at Glendale Estate, Leixlip, Co. Kildare.

1. Proposed substation in Glendale Estate

It is proposed to locate the substation for Leixlip Confey train station on the green area in Glendale Estate, on the east side of Cope Bridge (whereas the train station is on the west side of the bridge). The green area is wholly within a residential development, and is a recreational green space for the residents of the estate. It has been in place since the estate was completed over 40 years ago, and since then it has been maintained and enhanced by residents, at own expense and time.

The proposed substation is large and would consume a sizable portion of the green area. Based on the photomontage provided (ref. Drawing: MAY MDC LAN ROUT DR U 15570 D, below), it appears that it would take up the full width of the north-eastern part of the green, with a height similar to that of Cope Bridge. This would certainly dominate the green area due to its size and scale. Furthermore, as an industrial building, its design is completely incongruous with the neighbourhood, and as a result it is completely unsuitable for the proposed location.

The photomontage provided shows trees in front of the building, with more closer to the road.



However the drawing of the site, MAY MDC SET RS12 DR Z 0003 D, shows “Landscape planting” on the canal side of the building only.



Therefore it is unclear to me that the plan includes the planting of trees on the southern side. Even if such plans were to be put in place, the trees would need to be of a certain maturity in order to (1) replace the mature trees that are proposed to be removed, and (2) provide the level of shielding shown in the photomontage. New growth would take many years to have any material impact, and in the mean-time residents would be left with an eyesore that would make the use of the green unpleasant.

I'd also like to note that the photomontage with the proposed substation seems to introduce a raising of the ground level around the substation when compared to the photomontage of the existing green area, as shown in the two photos below. If this is the case, it would only serve to further increase the impact of the substation on the landscape.



There is also a planned access road which would take up a sizable portion of the green area and crosses a path used by residents to access the train station, Confey GAA grounds, the graveyard etc. Introducing industrial vehicles across this path in this residential area is creating a potentially dangerous situation.

It appears from the drawings that this access road is open i.e. there is no barrier between it and the green area – again introducing potential dangers to what is a recreational area, which is used by children as well as adults and animals. I should also note that in my view this issue should not be solved by requiring a large industrial fence along the access road as aesthetically it would be completely unsuitable.

More generally, I find the level of information about the substation to be lacking. The reason for the size of the building is unclear. I note that in the document 'Chapter 3 Alternatives', it explains that one of the reasons for changing from the original planned position at the train station to the current proposed location on the green at Glendale Estate was due to a need to increase the size of the building. However I couldn't find any further details on the reason why a larger building is required, or what the purpose of the numerous rooms are, or how often it will need to be accessed. The plan (above) shows facilities such as a small kitchen area, which would imply that this building is going to be regularly used. Glendale Estate is a residential estate and is not suitable for an industrial building, or for the type (and potentially volume) of work traffic associated with such a building.

I also note that even though CIÉ do own land along the boundary of the train line, as marked in pink in the above, the proposed location of the substation is completely on the green area that is privately owned and used by residents. The reason for this is unclear given that at other stations, the substation is proposed to be far closer to the railway line e.g. Ashtown. Even if the substation were to be moved closer to the train line, issues would still remain regarding:

- the use of a green area in a residential development for an industrial building,
- the incongruous design which would dominate the green area,

- the dangers posed by introducing industrial traffic on a regular basis into a residential estate, including the crossing with an established pathway, and the interaction between the proposed access road and green recreational area, and
- the removal of mature trees.

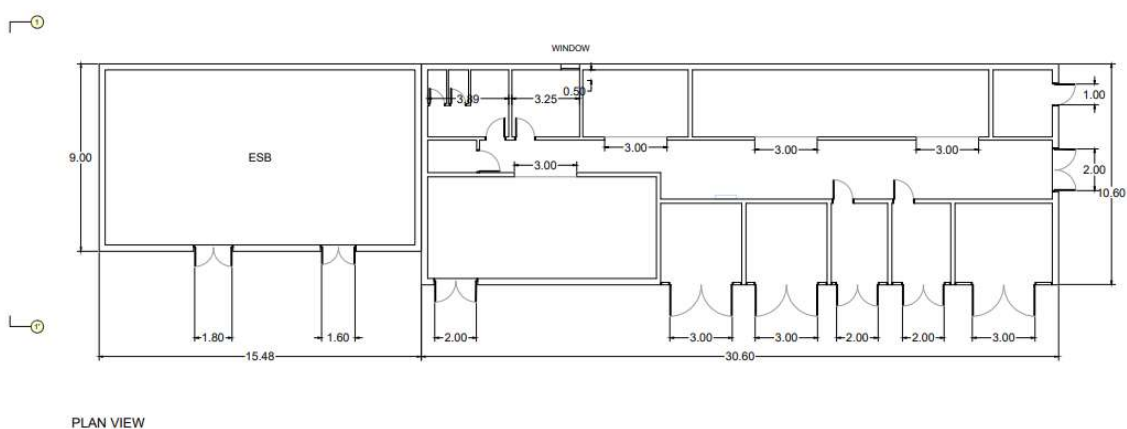
Therefore, there are many reasons why the current proposal is unsuitable. These largely stem from the fact that the proposed location is on a green recreational area in a residential development that was never intended for nor is suitable for an industrial building or industrial traffic. For that reason, I would urge An Bord Pleanála to re-examine the first option of locating the substation within the grounds of Leixlip Confey train station. It is naturally more suitable and offers many advantages including:

- the land is already owned by CIÉ,
- it already has an accessible road,
- impact on residents will be considerably less,
- risk to pedestrians is far less,
- it is not adjoining a play area for children,
- it is directly accessible from the main road,
- it can accommodate an industrial style building,
- it does not require the removal of mature trees,
- it does not require the damaging of flora and fauna,
- it is not removing a green area.

Therefore it is safer, and more suited to the environment.

The reasons why this option was subsequently discounted was due to an increased size in the building and a need for it to be accessible on all sides. Two-storeys was considered not possible due to issues with overlooking. However has any consideration been given to the substation being fully or partially underground? This would avoid overlooking of the neighbouring properties. I found no evidence of this being considered.

Also the reason for accessibility on all sides is unclear. The plans, as per Drawing MAY MDC SET RS12 DR Z 0010 D, show doors on two sides only:



Therefore there is no clear reason as to why the building needs to be accessed on all four sides. I note that at Ashtown station, the side without doors adjoins the platform and it is unclear why the same approach could not be done at Leixlip Confey.

Furthermore, the reduction in the number of parking spaces was also raised as a disadvantage of locating the substation within the grounds of the train station. However additional parking spaces could be provided by the removal of the large ticket station. It is generally not used, and as the future is likely to see a reduced requirement for such a facility (the ticket office at Tara Street was removed several years ago despite that being a far busier station), this is an opportunity to improve overall station access. In reviewing the documentation, it was not clear to me what plans are included for the redevelopment of the station itself. Given the current climate change issues and the plans of the Government to reduce car usage, I do not see the reduction in car spaces as being a disadvantage. The train station is largely used by local residents and therefore there should only be a need to provide a limited number of spaces for those who are unable to walk or cycle to it.

Overall, I believe there are many strong and clear reasons against the current proposal to locate the substation on the green space at Glendale Estate, and multiple advantages to locating it in its original position at Confey train station. It would seem to me that insufficient analysis has been carried out on both the short-term and long-term detrimental impact of the current proposal on residents and the environment, and that there is no impediment to locating it within the grounds of the train station as originally planned.

2. Construction Compound on Glendale Estate Green

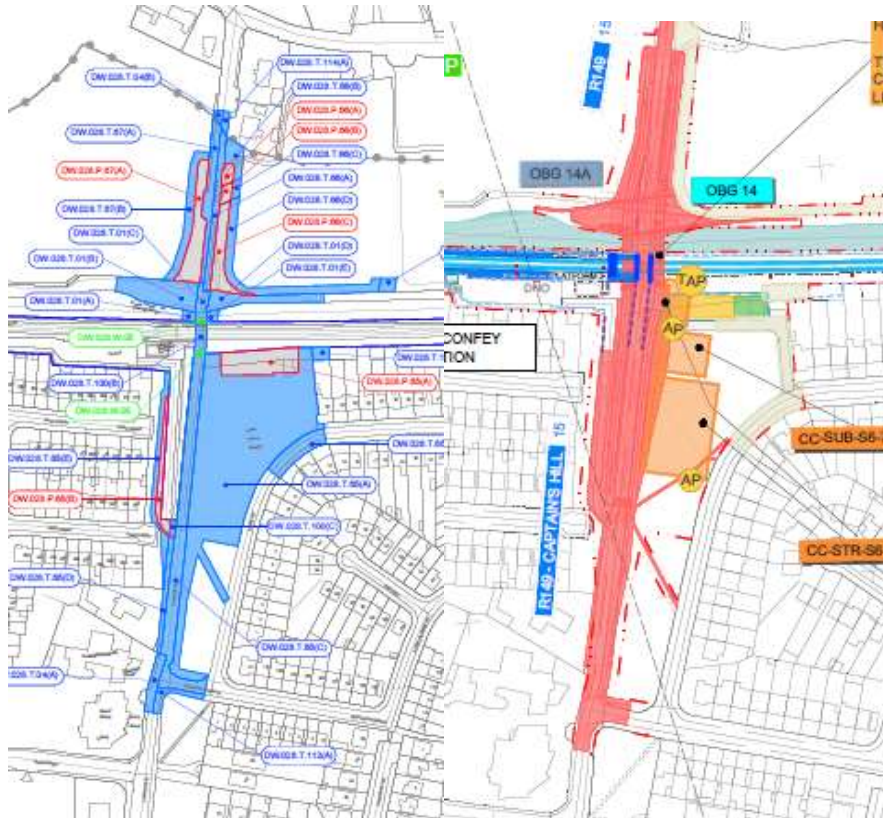
In addition to the proposal to locate the substation, a permanent structure, on the green at Glendale Estate, there is also a proposal to take over a large portion of the green area on a temporary basis for a construction compound. This temporary basis is I understand it several years in duration. This would destroy much of the grass, flora and fauna, which would take years to recover. It would also significantly reduce the usable space for residents with a very large portion converted to a construction site. As a result, it would become extremely unattractive as a recreational area, and therefore in all likelihood the entire green would become unusable. I consider this to be an unacceptable level of impact on residents. The green area is a recreational space, which the residents have been caring for, for over 40 years. It is an area for children to play on and for residents to enjoy. It is located in a residential development, and is not suitable for accommodating construction traffic.

I could not locate full details of the planned use of the construction compound and if it would be intended to be accessed by construction vehicles – if so, the intended access point has not been made clear, but presumably it would be from within the estate. The estate road is completely unsuitable for such traffic in terms of volume and size. It was never designed to take heavy vehicles on a regular basis, and it cannot accommodate them. Alternatives should be sought such as the land at the train station, and/or the vacant site on the far side of the canal which has been recently used for development work and could accommodate construction traffic and materials with far less impact on residents. I could not find evidence that this has been considered, but given that the site has already been used for development, I would presume the landowner would again be open to this. This would be far more suitable and safer for all.

I am also concerned with the extent of the land which is proposed to be taken into temporary possession as highlighted in blue in the following drawing. It covers almost all of the green including the two footpaths, and also a portion of the road. I could not find an explanation of the reason for this, and how the temporary possession of the road will be used and what the implications are for residents and particularly those living in the houses directly adjoining that part of the road. I am unaware of any communication with the affected residents about this.

I am also unclear as to why the area to be taken into temporary possession differs materially in size to the area shown for the construction compound in orange in a different drawing (compared below).

Either would result in the loss of a large portion of the green, and in the case of the area in blue, it is effectively almost all of it.



3. Proposed Footbridge at Cope Bridge

I also have concerns regarding the proposed east footbridge at Cope Bridge which again takes up a considerable amount of the recreational green space at Glendale Estate.

While the goal of providing safer pedestrian and cycle paths is clear, the reason for two footbridges, each 4m wide is less so. I understand it is being planned to align with the intentions of Kildare County Council regarding the future development on and around the current Confey GAA grounds, however the need for a 4m width of pathway and 4m width of cycle lanes has not been explained. I'm aware that there is a general plan to provide cycle lanes 2m in width in order to allow cyclists to pass out other cyclists, but surely this can be sufficiently accommodated with one such 2m cycle lane? There are traffic lights currently at the train station, and a crossing is planned on the other side of the bridge as part of the Leixlip LAP. Therefore a cycle lane on one side of Cope Bridge (either east or west) should be sufficient. In fact, from the point of view of accessing the train station, the bridge on the west side seems to be the most appropriate.

The pathway could similarly be reduced to 2m, and either only on the west side together with the cycle lanes, or else on the east side with the cycle lanes only on the west side.

This would allow the east footbridge to be reduced to 2m or removed altogether.

As it is currently planned, the east footbridge is designed with an embankment beside it, even further reducing the amount of usable green space in Glendale Estate. I cannot see any reason why this embankment is proposed or what its purpose is. A standard bridge could be constructed instead which would leave the area around and underneath it to be usable for residents. It would also reduce the planned removal of mature trees planted by the residents over the years. In fact, I believe with a more imaginative design, a bridge could be installed without the removal of any tree. Given the permanency of such a structure and its position, it would seem appropriate to me to create a design that is pleasing to the eye, and with minimal impact on the environment.

I would also like to highlight that the actual extent of green area impacted has not been fully qualified. Drawing MAY MDC SET RS12 DR Z 0003 D, above, seems to imply that the embankment would be 3m in width. However a different drawing, MAY MDC STR RS12 DR C 0003 D, shows the embankment varying in size, up to more than the width of the footbridge itself and therefore being over 4m at times. This would be a considerable infringement on the green space.

I would urge An Bord Pleanála to consider the need for the proposals as they are, and to require at a minimum a re-design of the bridge so as to minimise the loss of green recreational space unnecessarily.

4. Planned Traffic Management changes at Cope Bridge

In addition to the proposed works which are required for the electrification of the railway, there is also a proposal to revert to two-way traffic on Cope Bridge. It is my understanding that this is not required to complete the works required for the railway but is being planned to accommodate future residential development on the canal side of the bridge. However I could not find that the impact of this proposed change on congestion levels in the area has been given due consideration.

Cope Bridge has been single-lane traffic for many years now. Traffic volumes have changed considerably from when the bridge was previously two-way, and the impact of reverting to such traffic flows should not be underestimated. Congestion on Captain's Hill is already an issue, and would be considerably worsened if traffic were allowed to flow more freely over Cope Bridge.

The access to and from Glendale Estate and Riverforest Estate would also be considerably constrained if the current break in traffic, facilitated by the one-way system were to be removed.

Highlighting again the objective of the Government to encourage more use of alternative transport methods such as public transport, it seems contradictory to be trying to facilitate increased traffic volumes over the bridge. In fact, maintaining the current single-lane traffic management system would seem more in line with the goal of reducing car usage.

I therefore believe that it is in the interests of future planning to continue with the current restriction to single-lane traffic only in order to better manage traffic volumes to and around the area.

Conclusion

In conclusion I have significant concerns regarding aspects of the proposed development at and around Glendale Estate. The green area would be materially harmed by several aspects of the proposal, with significant loss of permanent recreational space due to the proposed substation together with its access road, and the proposed 4m wide east footbridge together with the 3m plus

embankment. There would also be temporary loss and consequential damage from the proposed large construction compound.

The introduction of construction traffic and presumably heavy vehicles into the estate both during construction and afterwards would introduce road safety issues for residents which should be avoided at all costs.

The proposed change to the traffic flow over Cope Bridge is not required for this project, and would cause increase traffic volumes and congestion, bringing further damage to the environment.

While I support the initiative to improve the train service, it should be done in the best interests of residents, rather than with harmful impact to the environment and to residents' enjoyment of their local amenity.

This can be achieved with careful and considerate planning.

I thank you for taking on board my comments.

Yours sincerely,

Sonja Brennan