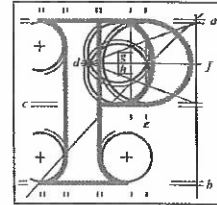


**Our Case Number:** ABP-314232-22



**An  
Bord  
Pleanála**

William J. Smith  
Lock House  
Laraghbryan  
Maynooth  
Co. Kildare  
W23 H6Y3

**Date:** 01 September 2022

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

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed railway order and will take it into consideration in its determination of the matter. A receipt for the fee lodged is enclosed.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the relevant City/County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

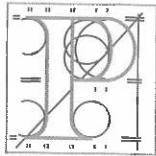
Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

RA05

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1890 275 175
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<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
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64 Sráid Maoilbhríde	64 Marlborough Street
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An  
Bord  
Pleanála

## SID Online Observation

### Online Reference

SID-OBS-000164

### Online Observation Details

Contact Name  
William Smyth

Lodgement Date  
26/08/2022 12:59:57

Case Number / Description  
314232

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
W J Smyth

Payment Amount  
€50.00

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐ Yes

☐ No

Request Emailed to Senior Executive Officer for Approval

☐ Yes

☐ No

Signed

EO

Date

### Finance Section

Payment Reference

ch\_3Lb1CbB1CW0EN5FC0xhnXdon

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board  
Member

Date

Date

**Observations re: DRAFT Railway Order Application “DART+ West Electrified Heavy Railway Order [2022]”**

**Submitted by William J. Smyth**

**Case reference: NA29S.314232**

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314232: County Dublin, County Meath, County Kildare

Dublin City Council

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Description

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

Case type

Railway Order Application







## **JACKSON'S BRIDGE VIEW FROM PROPOSED DEPOT LANDS FEBRUARY 2020**

I would like to submit the following observations concerning the application submitted by Irish Rail on July 29<sup>th</sup> 2022.

The Railway Order seeks planning approval for electrification of the commuter railway line, Dublin-Maynooth, including a spur line from Clonsilla to M3 Parkway. It requests also approval for the construction of a maintenance depot west of Maynooth and east of Kilcock.

**Primary Observation:** The two parts of this draft order are clearly interrelated – the depot, it is argued, is an intrinsic requirement for servicing the expanded fleet of electrified trains. Accepting that the geographical position of the electrified line is already determined by the positioning of the existing railway corridor, I would, nonetheless, assert that the geographical location of the Depot is not pre-determined. The Railway Order refers to the investigation of several alternative sites for the Depot. It is my contention that the locational analysis leading to the selection of a site west of Maynooth is flawed. The site chosen is wrong for several reasons as identified below.

I accept, without reservation, the regional and national value arising from the electrification of the commuter line. I do not accept that the choice of Depot location is appropriate to servicing the maintenance requirements arising from the expanded fleet of electrified trains.

### **Subsidiary observation (1):**

The maintenance Depot is to be located on agricultural land, commencing approximately three kilometres west of Maynooth and extending over more than two kilometres towards the residential fringe of Kilcock. It will impose a heavy industrial presence immediately parallel to the Royal Canal Greenway in a landscape where that facility emerges from a suburban landscape to an unimpeded vista of rurality.

The construction of the Royal Canal Greenway, a regional and national success, has won international praise. In 2022 the Greenway was awarded European Cycle Route of the Year. Other successes include the 2021 All-Ireland Community & Council Awards for the "Best Tourism Initiative" 2021, and the "highly commended" in the "Excellence" category at the European Greenway Awards. All of these awards stressed the significance of the rural ambiance of the Greenway which so successfully translates a late eighteenth century transport corridor into a recreational provision for walkers and cyclists in the twenty first century.

Inland Waterways, Kildare County Council and all adjoining county councils have invested heavily in the restoration, maintenance and advertising of this unique heritage facility. It is now proposed to construct specialised tracks for brake testing of trains, sheds for maintenance and ancillary administrative buildings all within a few metres of the Greenway. Light and noise pollution and an industrial landscape will now characterise the Greenway over a distance of 2.6 kilometres. The proposal to construct such infrastructure is at variance with the accepted planning ethos and designations enshrined in the current Kildare County Development Plan which recognises the potential of the existing canal-way facility. In relation to the Royal Canal the Kildare County Development Plan, 2017-23 states *"The smooth terrain, generally gentle landform and low canal bank grassland that characterise the canal corridors allow vistas over long distances without disruption, where the canal flows in a straight line direction. Consequently, development can have a disproportionate visual impact along the water corridor and it can prove difficult for the existing topography to visually absorb development."* The proposed site for the Depot is, in fact, the first and most extensive straight line alignment of the Royal Canal in the first twenty five kilometres of its corridor west of Dublin.

**Subsidiary Observation (2):** Construction of the Depot, ancillary roadways and extensive water containment ponds will impact negatively upon the ecology of a long-established agricultural area and will undoubtedly have a significant negative impact on local biodiversity. Very many hectares of prime agricultural land will be converted into the concrete and asphalt of the Depot and the re-aligned regional roads in the area. In the process a unique historical landscape will be eradicated. The land upon which most of the development will be concentrated contains an eighteenth landscape of field boundaries and drainage systems and Georgian residence that formed an intrinsic part of the

agricultural strategy of the Duke of Leinster who planned several “strong “ farms in the orbit of his Carton demesne.

**Subsidiary observation (3):** The proposed location of the Depot will fracture the historical green belt that separates the towns of Maynooth and Kilcock and establishes a precedent for further development north of the Depot and Royal canal. This future development threat will be supported also by the associated realignment of the regional roads in the area. Urban sprawl and ill-advised planning will be a threat to the current restrictions on the westward spread of Maynooth.

**Subsidiary observation (4):** The proposed Depot will impact negatively upon the residential area located some 500 metres to the east of the industrial development. Within the period 2018-2022 upwards of one hundred new residential buildings have been constructed to the south of the Royal Canal at Kilcock and proximate to the western margin of the curtilage of the Depot. Construction of this residential enclave is very much at variance with the decision to locate the Depot as proposed. In part this serious disconnect may well be a function of the sequential pattern of site assessment that has preceded issuance of the Railway Order. Irish Rail considered the location of the Depot at a Risk Management Workshop held in Inchicore Training School on 21st April 2009. The outcome of the workshop was a recommendation that a site west of Maynooth offered the best relative value for the location of a Depot “and is therefore the preferred site”. Ten years later the consultancy report authored by IDOM confirmed this site west of Maynooth as the preferred choice. In the intervening decade the Royal Canal Greenway had been designed and constructed and planning permission for residential buildings, south of the Royal Canal and proximate to the preferred Depot site, had been granted. Construction of this residential development proceeded and was largely complete by the time of the IDOM report and the first non-statutory public consultation on Dart+ West project (26<sup>th</sup> Aug- 21<sup>st</sup> Oct 2020). Neither of these two physical developments appear to have impacted on the IDOM review of the 2009 recommendation.

**Subsidiary observation (5):** IDOM determined that a minimum area of 20 hectares was required to support a depot. Thirteen sites were evaluated

despite nine of them affording obviously inadequate minimal space for the pre-set Depot requirements. Four sites were shortlisted for further consideration:

Drogheda Environs

Maynooth Environs

M3 Parkway Environs

Hazelhatch Environs

Of these it is readily apparent that Drogheda, not scheduled for an electrified rail link in the immediate future, was of little practical interest as a support to the imminent Dart+ west project.

Evaluation of the remaining three Environs was based on a qualitative assessment of eight variables. It is not evident that any quantitative weighting was applied to distinguish between the relative significance of the eight variables. On the basis of this qualitative assessment it was recommended that the site west of Maynooth was the preferred option **but** both Maynooth West **and** M3 Parkway were both identified as having "significant advantages to other options" (IDOM P.69 Site location analysis 2019/20)

The determining factors mitigating against M3 Parkway were the perceived difficulty of access on a functioning line compared with the relative underuse of the line west of Maynooth. The potential for flooding in the Tolka valley was also determined as a serious disadvantage.

I would wish to comment on these specific distinguishing factors:

- (a) Track access: Undoubtedly there will be easier track access to the Maynooth West site but at a cost. Access to that site requires the construction of a five kilometre electrified track west of Maynooth and parallel to the existing Sligo mainline railway. That five kilometres of additional electrified track will have no community function, it will not, for example, bring an electrified service to Kilcock. Its sole purpose is to provide access to a Depot planned for a site that otherwise would not be deemed accessible. This will require "empty running" of trains on a daily basis beyond the terminal of the commuter line. Based on an assumed 60 trains per day entering the depot more than 100,000 kms of empty running will be engineered per annum with an equivalent figure for the exiting journey from the Depot. It does not represent **Value For Money**.



- (b) The potential for flooding, identified for the upper reaches of the Tolka valley, is a consequence of a dendritic drainage pattern which generates a network of small streams meandering across a relatively undulating plain consisting of poorly drained boulder clay dating from the Pleistocene era. Precisely the same drainage problem should have been apparent in the drainage basin to the west of Maynooth. However, it was only after having decided upon the Maynooth West site as the preferred option that Irish Rail conducted a Stage 3 hydrological analysis of the area in May 2021. Not surprisingly, major drainage problems were identified for the preferred site and the proposed solution is to construct several containment ponds stretching over several kilometres to alleviate expected flood damage. Such an approach does not represent **Value For Money** and it certainly does not serve as a supportive and distinguishing variable vis a vis the M3 Parkway site.
- (c) General regional access to both the Maynooth West site and the M3 Parkway site is comparable. The M4 and M3 serve the respective localities. But in terms of specific local access linking with the motorway network, the Maynooth site now appears to have significant disadvantages that were not originally alluded to. Subsequent to issuance of the preliminary report on the preferred options for the Depot it has now been recognised that Jackson's Bridge to the west of Maynooth is a protected structure of considerable significance. Revised planning now envisages converting Jackson's Bridge into a cul de sac and providing access to the Depot via a newly constructed road that will initially run south of the canal before bridging the canal at the Depot and thereby rejoining the Kilcock-Maynooth regional road. This is a major roadway infrastructure and in comparison with the M3 Parkway locational access it does not represent **Value For Money**.
- (d) Linkage access from the M4 motorway to the Depot is envisaged as proceeding through the town of Maynooth. This distinctive historical urban centre has the unique attribute of being Ireland's only university town. It has been assisted by public and private initiatives in developing that profile over the past three decades and as part of its protected planning environment all HGV vehicles are banned from the town. HGVs servicing the Depot should not fracture this established traffic restriction. Should the expected traffic flow of the more than 200

expected Depot workforce be routed through the town of Maynooth it will generate a further negative impact on the urban ambiance.

**Summary observation:**

Overall, the evident disconnects in the selection process that favoured Maynooth West over M3 Parkway merits further review. The evidence of the Stage 3 hydrological investigation, and the admitted requirement that a new roadway access to the Depot, with attendant bridge construction and land acquisition costs, demands a reversal of what I believe to be an erroneous judgement that is rooted in arguments more than a decade old and which take little cognisance of the developmental realities that have occurred along the canal and in the suburbs of Kilcock in the intervening years..

William J. Smyth

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