



Planning Department  
Kildare County Council  
Aras Chill Dara  
Newbridge Road  
Naas  
Co. Kildare

1<sup>st</sup> November 2019

**Re: Submissions to Material Alterations of draft Leixlip Local Area Plan.**

Dear Sir/Madam,

We wish to make the following submissions to the Material Alterations to the draft Leixlip Local Area Plan in relation to:

- 1.0** The proposal to include new objective MT2.7 requiring liaison with the NTA in relation to the provision of a new railway station and park and ride facility at Collinstown.
- 2.0** The proposal under new objective COL1.1 to provide a masterplan for the entire Collinstown lands designated as Q – Enterprise and Employment.

We make the following submissions:

**1.0 The proposal to include new objective MT2.7 requiring liaison with the NTA in relation to the provision of a new railway station and park and ride facility at Collinstown.**

Since 2007, Killross Properties Limited (“Killross”) has owned part of the overall lands are currently designated for Q – Enterprise & Employment uses at Collinstown.

Following adoption of the 2009 Collinstown LAP, Killross and the other (then) Collinstown landowners engaged extensively with Kildare County Council in order to prepare a masterplan for the development of a Major Town Centre at Collinstown lands in accordance with the objectives of the 2009 Collinstown LAP requiring that masterplan.

Ultimately, the masterplan commenced under the objectives of the 2009 Collinstown LAP could not be completed and was abandoned largely due to the uncertainty surrounding arising from the requirements of the LAP to facilitate a train station in Collinstown.

Following consultations with Irish Rail in 2012, we received a letter from Irish Rail in October 2012 which sets out the issues on the proposal to provide a new train station at Collinstown, see copy letter attached.

The letter from Irish Rail states, inter alia, that:

*Irrespective of the proposed phasing of any development, Iarnrod Eireann cannot support the construction and operation of a train station if the necessary critical mass of development does not exist for a number of key reasons, including;*

- the build it and they will come aspiration of the past is in our view not fit for purpose.*
- the CAF requirement from the DTT&S /NTA that any new project must be supported by a robust /approved business case clearly points to the need or critical mass to support a project. This in our view warrants the phasing of transportation infrastructure at the mis to latter stages of development rather than a policy of frontloading which has been the experience heretofore While Iarnrod Eireann is a rail operator and not a transport policy maker we would support future initiatives which have balanced and appropriate phasing of transportation infrastructure vis-a-vis the scale of the proposed development.*

The Irish Rail letter concludes by saying:

*If in future there is significant development, an approved business case and funding availability then Iarnrod Eireann will give serious consideration to the matter of a new station at Collinstown in full consultation with all stakeholders including the NTA, Until such times we could not however support any station where there is no critical mass of development for the reasons outlined.*

In summary, Irish Rail indicated to the Collinstown landowners at the time that a new train station at Collinstown was not viable until such time as there was a critical mass of development available to support the construction and operation of a new station. That remains the case today.

While the 2009 Collinstown masterplan included for the provision of over 1,000 new residential units within Collinstown to support a new station, the current draft Leixlip LAP has removed all residential development from Collinstown thereby almost entirely removing the critical mass of development and people necessary to support a new train station at Collinstown. The 'Q – Employment and Enterprise' zoning now proposed for Collinstown will never create a sufficient critical mass of development and rail users necessary to support a new train station at Collinstown.

Based on our experience with the masterplanning of the Collinstown lands under the 2009 Collinstown LAP, and the lessons learned from that masterplan, we strongly believe that the same errors with regard to a train station are being made again in the draft Leixlip LAP 2020.

The first error being made is continue to leave any uncertainty within the Leixlip LAP as to whether or not a new train station is required at Collinstown. This continuing uncertainty leaves the development process for the lands at of the lands at Collinstown unable to commence as the 'with train station' and 'without train station' development scenarios for Collinstown are entirely different.

The second error is to continue to liaise with the NTA in relation to a new station at COLLinstown where Kildare County Council has already decided that a new station has significant negative effects and where the NTA has not provided any information or facts to the draft Leixlip LAP in order to support a new station at Collinstown.

In this regard we refer to the recent analysis on the provision of a train station and/or park and ride facility at Collinstown which was conducted by AECOM on behalf of Kildare County Council within the Leixlip Strategic Transportation Assessment ("LSTA"), which was published in May 2019, in order to inform the current draft of the Leixlip LAP, copy attached.

The LSTA, at page 48, refers to two meetings between Kildare County Council and TII and NTA senior staff on 1<sup>st</sup> February 2019 and 12<sup>th</sup> February 2019.

Following those meetings, Kildare County Council engaged Aecom to carry out an analysis of various options for the provision of improved rail services in Leixlip. At section 8.1 of the LSTA, three options for the provision of a new train station at Collinstown are described as follows:

*Rail - 7            Add a new station by Collinstown and maintain existing stations*

*Rail - 8            Add a new station by Collinstown and close Confey Station*

*Rail - 9            Add a new station by Collinstown and close Louisa Bridge Station*

The conclusion to the analysis of the three options relating to the provision of a new or replacement train station at Collinstown is given at page 87 – Table: 8.3 of the LSTA as follows:

*Rail 7 - An additional station at Collinstown would only increase the total rail catchment for existing buildings in Leixlip by 23 residential homes and 22 commercial units at considerable financial and environmental cost. While this site could be used for a future rail oriented development site, this is not yet necessary as there are multiple rail-accessible sites which can be developed in Leixlip. Accessibility and social inclusion would benefit from three stations, but would come at high financial and environmental cost.*

*Rail 8 - Providing Collinstown Station and closing Confey would result in the loss of 1,471 buildings from the total Leixlip rail catchment for the addition of 45 buildings at Collinstown.*

*Rail 9 - Providing Collinstown Station and closing Louisa Bridge would result in the loss of 1,366 buildings from the total Leixlip rail catchment for the addition of 45 buildings at Collinstown.*

Based on the analysis conducted within the LSTA, all of the options considered for the provision of a new train station at Collinstown are negative, with the 'Rail 9' option, being the replacement of the Louisa Bridge Station with a new station in Collinstown, in the worst category of "Major or highly negative".

The creation of a new train station at Collinstown and the closure of existing train station at Louisa Bridge would create significant additional and unnecessary expense and would remove 1,471 buildings from Leixlip rail catchment and would curtail the development of 45 new employment generating buildings at Collinstown.

Therefore, it is our submission that the requirement of proposed new objective MT2.7 to liaise with the NTA regarding the provision of a new station and park and ride facilities at Collinstown has been super-ceded by the findings of the LSTA in May 2019 wherein a new station at Collinstown is considered to be the most negative option for the improvement of rail facilities in Leixlip.

#### **Liaison with NTA by Killross:**

By letter dated 21<sup>st</sup> March 2019, copy attached, Killross' planning consultant Declan Brassil & Co. wrote to the NTA seeking, inter alia, confirmation on:

- a) *What quantum (approximately) of 'Business and Technology' office and related development at Collinstown is necessary to sustain a new train station at Collinstown;*

We have not received any response from NTA to this letter and on that basis we are concerned that the proposed liaison with NTA that is provide for in objective MT2.7 will cause unnecessary delay in implementing the primary objectives of the Q zoning to deliver employment generating uses.

Furthermore, the NTA has not made any submissions to the draft Leixlip LAP to support the demand for a new train station in Collinstown. In the absence of information and evidence from the NTA supporting a new train station at Collinstown, the findings of the Leixlip Strategic Transportation Assessment that a new train station at Collinstown has negative effects on Leixlip and on rail use, the proposed objective to liaise with the NTA is unsustainable and is not in accordance with the proper planning and sustainable development of the area.

**Amendment of proposed new objective MT2.7:**

In order to ensure the orderly and expedient development of the Collinstown lands in accordance with the proper planning and sustainable development of the area, it is requested that proposed new objective MT2.7 is deleted from the draft Leixlip LAP, as the provision of a new train station at Collinstown is not supported by Kildare County Council's Strategic Transportation Assessment for Leixlip dated May 2019 and the critical mass of development necessary to support a new train station cannot be created within the proposed Q – Enterprise and Employment zoning designated for the Collinstown Business Campus.

**Alternative amendment of proposed new objective MT2.7:**

If the Council determines that liaison with NTA on t new train station at Collinstown should remain as an objective of the Leixlip LAP. objective MT2.7 should be amended to limit the time period within which the liaison with the NTA to no more than 6 months. If NTA cannot commit to a new train station at Collinstown within 6 months, the development of Collinstown Business Campus should be permitted to proceed without a train station.

This will allow a reasonable time period within which to explore the requirement to provide a train station at Collinstown while allowing some certainty to landowner who do not wish to wait for years before beginning the master-planning of Collinstown Business Campus.

**2.0 Submissions on the proposal under new objective COL1.1 to provide a masterplan for the entire Collinstown lands designated as Q – Enterprise and Employment.**

The masterplan requirement is proposed under New Objective COL1.1

The proposed amendments to the draft Leixlip Local Area plan includes:

*COL1.1: To require the preparation of a Masterplan (to be developed in conjunction with relevant traffic/ transport assessments) for Collinstown giving full consideration to the type and intensity of development relative to future transport options and in particular public transport provision (the potential for a rail station at Collinstown, park and ride facilities, bus network revisions and the principles and priorities set out in Section 12.7.3) and to work with the NTA in this regard. Individual applications for smaller sections of these lands will not be considered until such time as a single masterplan has been prepared and agreed in writing with the Planning Department of Kildare County Council.*

This proposed New Objective COL1.1 renders the development of the Collinstown lands for the purpose of providing employment generating development extremely difficult and unnecessarily complicated for the following reasons

Based on our experience in relation to the masterplan for the Collinstown lands under the 2009 Collinstown LAP, we submit that a masterplan for the entire 115 acres of Collinstown to be prepared years, perhaps decades in advance does not take account of the commercial realities involved in commercial property development wherein the market dictates the scale and design of commercial buildings.

Furthermore, as there are 6 landowners involved in the lands designated Q - Enterprise & Employment lands at Collinstown, each with very different objectives, some of which have other business interests which may not accord with the requirement to provide employment generating uses at Collinstown in the short term, we submit that proposed objective COL1.1 be amended as follows:

*COL1.1: To require the preparation of a Masterplan (to be developed in conjunction with relevant traffic/ transport assessments) for Collinstown giving full consideration to the type and intensity of development relative to future transport options and in particular public transport provision (the potential for a rail station at Collinstown, park and ride facilities, bus network revisions and the principles and priorities set out in Section 12.7.3) and to work with the NTA in this regard. Individual applications for smaller sections of these lands will ~~not be~~ considered ~~until such time as a single~~ when **a masterplan for each landholding** has been prepared and agreed in writing with the Planning Department of Kildare County Council.*

This amendment will allow each of the landowners to agree the strategic connections and transportation links between their respective landholdings while allowing each landowner to progress the masterplan and subsequent development of their lands individually in the knowledge that a co-ordinated approach is being taken on the links required between each holding.

If a masterplan is required for the entirety of the Collinstown Business Campus, that masterplan will never be completed on the basis of the wording currently proposed the objective COL1.1 as it is too vague.

I trust the Council will afford due regard to the matters raised in this submission and will incorporate the proposed amendments in the Draft LLAP in the interests of adopting an implementable LAP that is consistent with national and regional policy, and the proper planning and sustainable development of Leixlip.

Yours sincerely,



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Lar McKenna

Strategic Planning Section  
National Transportation Authority  
Dún Scéine  
Harcourt Lane  
Dublin 2  
D02 WT20

21 March 2019

**Re: Collinstown Local Area Plan 2010 and Draft Leixlip Local Area Plan– Objective for a Train Station at Collinstown, Leixlip, County Kildare**

Dear Sir/Madam

We act for Killross Properties, a significant landowner in the Collinstown area of Leixlip.

Our client's lands, together with other adjoining lands, are proposed to be zoned for "Q- Business & Technology" uses in the draft Leixlip Local Area Plan. We note that the zoning matrix for 'Business & Technology' uses at Collinstown supports office, commercial and light industrial uses only and does not permit any residential development within any part of the proposed zoning.

Objective MTO2.6 the most recent draft of the Leixlip Local Area Plan facilitates consideration of a potential rail station at Collinstown to services the area including our Client's lands, as follows:

*"MTO2.6 To liaise with the National Transport Authority and Irish Rail to consider the provision of a new rail station at Collinstown."*

I note that there is no reference to a proposed rail station at Collinstown in the current NTA Strategy for the Greater Dublin Area. Accordingly, I would appreciate if the NTA could clarify the following matters:

- a) Whether the NTA Transport Strategy for Collinstown, Leixlip or North Kildare proposes or supports the provision of a new train station at Collinstown;
- b) Whether public funding for the provision of a new train station at Collinstown is available;
- c) What quantum (approximately) of 'Business and Technology' office and related development at Collinstown is necessary to sustain a new train station at Collinstown;
- d) What quantum (approximately) of new residential development in the area would be required at to sustain a new train station at Collinstown.

I trust that this is in order and I look forward to an early response.

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Yours faithfully

Declan Brassil  
**Declan Brassil & Co.**

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Mr. John Spain  
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John Spain Associates  
Planning & Development Consultants  
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1st October 2012

Dear John,

I refer to your letter of 24<sup>th</sup> September and our recent meeting with landowners in relation to the Collinstown Local Area Plan. Specifically you have sought clarification on whether Iarnród Éireann is likely to support the construction and operation of a train station within Phase 1 as required by the LAP if the necessary critical mass of development does not exist.

As mentioned at the meeting the construction and operation of a new station at Collinstown will require the project sponsor/s to submit a Business Case as per the current Common Appraisal Framework Guidelines for Transport Projects & Programmes (CAF). The Business Case will generally have to set out in some detail:-

- Need for the project
- What options (including alternatives) have been considered
- Service Levels / Demand estimates of the preferred option (usually requiring the NTA model)
- Capital / Operating Costs
- Financial Analysis
- Economic Evaluation
- Funding options
- Risk Assessment
- Benefits & Impacts

On a point of clarification please note that Iarnród Éireann is not the authority responsible for approving Business Cases which is the responsibility of the NTA / DTT&S. We too must follow the Business Case approval system before proceeding with any rail infrastructure investment project.

In the case of any future Business Case for Collinstown it is clear that a robust case will have to be made for the station particularly in view of the severe contraction of the economy, the collapse of the housing market and the lack of / competition for funding in general for capital investment projects.

Irrespective of the proposed phasing of any development, Iarnród Éireann cannot support the construction and operation of a train station if the necessary critical mass of development does not exist for a number of key reasons, including;

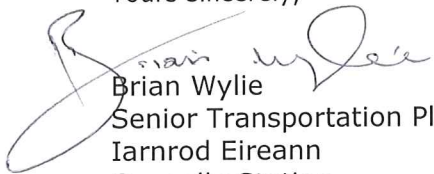


- while clearly well intended it is not good policy e.g. stations like Clongriffin (among others) where the rail station pre-empted the intended level of development are not in the best interests of passengers, Iarnród Éireann or the taxpayer.
- the build-it-and-they-will come aspiration of the past is in our view not fit for purpose. Early phasing of transport infrastructure in ambitious developments, particularly in the current climate is in our view not prudent and is a risk that few business cases are likely to support
- the CAF requirement from the DTT&S / NTA that any new project must be supported by a robust / approved business case clearly points to the need for critical mass to support a project. This in our view warrants the phasing of transportation infrastructure at the mid to latter stages of development rather than a policy of frontloading which has been the experience heretofore. While Iarnród Éireann is a rail operator and not a transport policy maker we would support future initiatives which have balanced and appropriate phasing of transportation infrastructure vis-a-vis the scale of the proposed development.

However, we acknowledge and recognise that the LAP is essentially a 20 year plan and subject to a robust Business Case and approval there may be a future case for a station at Collinstown if the proposed New Town develops as proposed. All options will need to be considered including the role of bus as an interim measure until such times as it can be established that there is sufficient demand to support the proposed rail station. It is also clear that any Business Case for the proposed Collinstown Station will need to justify the need for a third station (in addition to Leixlip Louisa Bridge and Confey) within the space of a few kilometres in this general location.

If in the future there is significant development, an approved business case and funding availability then Iarnród Éireann will give serious consideration to the matter of a new station at Collinstown in full consultation with all stakeholders including the NTA. Until such times we could not however support any station where there is no critical mass of development for the reasons outlined. I hope that this clarifies our position and addresses your query.

Yours sincerely,



Brian Wylie  
Senior Transportation Planner  
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