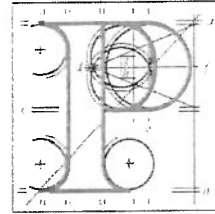


Our Case Number: ABP-320164-24

Your Reference: Greenwalk Homes Ltd



**An
Bord
Pleanála**

John Spain Associates
39 Fitzwilliam Place
Dublin 2
D02 ND61

Date: 31 October 2024

Re: DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch
Dublin City Centre and Drogheda, located in counties Dublin, Meath and Louth

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

RA03

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The Secretary,
 An Bord Pleanála,
 64 Marlborough Street,
 Dublin 1

AN BORD PLEANÁLA

LOG-
ABP-

22 OCT 2024

Fee: € 50.00 Type: CA

Time: 1642 By: HAND Date: 23rd October 2024
 JSA Ref: 24211/RK/LM

Dear Sir / Madam,

RE: SUBMISSION TO AN BORD PLEANÁLA IN RESPECT OF THE PROPOSED DART+ COASTAL NORTH RAILWAY ORDER 2024 – NORTHERN LINE BETWEEN DUBLIN CITY CENTRE & DROGHEDA INCLUDING THE HOWTH BRANCH IN RELATION TO BETTYSTOWN, COUNTY MEATH

ABP REF: 320164-24 – RAILWAY ORDER

1.0 Introduction

- 1.1 On behalf of our client, Greenwalk Homes Ltd., 27 Dawson Street, Dublin 2, we wish to make a submission to the DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch pending a decision with An Bord Pleanála under ABP Ref: 320164.
- 1.2 The application is being made pursuant to the provisions of Section 37 of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted) and constitutes a Strategic Infrastructure Development.
- 1.3 We note that the prescribed €50 fee accompanies this submission.
- 1.4 In summary, our client supports the principle of the development which will transform and vastly improve the connectivity between Drogheda and Dublin city. Our client is a highly renowned Irish housebuilder committed to delivering well-designed, sustainable residential homes across Ireland, particularly in the wider Dublin region.
- 1.5 In this respect, it is noted that our client has acquired lands within Bettystown and seeks to develop new, high-quality residential communities within the area as a result.

Summary

- 1.6 The submission herein raises a number of issues which our client considers can be resolved through amendments to the proposed works by way of further information furnished by the applicant to the Board, and via conditions attached to any grant of permission that the Board is minded to issue in future.
- 1.7 In summary, our client respectfully requests the following to be considered in the assessment of the application:

- *It is respectfully requested that any grant of permission for the proposed undergrounding works under the Railway Order application (as may be issued*

Managing Director: J Spain Executive Directors: P. Turley, R. Kuntz, S. Blair, B. Cregan, L. Wynner
 Senior Associate Directors: M. Nolan, K. Kerrigan, B. Coughlan, J. Livingstone Associate Director: T. Dechar
 John Spain Associates Ltd. trading as John Spain Associates

Registered Address: 39 Fitzwilliam Place, Dublin 2 Directors: A. Murphy, J. Brennan, J. Spain
 CRO No. 306360 V.A.T. No. B 84163664

by the Board in future) be appropriately conditioned to have regard to the future road network layout on our client's site as may be permitted, under a live planning application on the site (i.e. MCC Reg. Ref. 2460334) or otherwise.

- It is respectfully requested that An Bord Pleanála seek the introduction of a station at Bettystown by way of requesting further information from the applicant to amend the given proposals to include same.

Lands at Pilltown

- 1.8 It is acknowledged that part of our client's lands are included within the red line boundary of the subject Railway Order Application made to the Board. The subject proposals seek works across our client's lands at Pilltown Road to include the undergrounding of MV infrastructure to facilitate the electrification of the nearby railway line. These lands are currently subject of a planning application (MCC Reg. Ref. 2460334).
- 1.9 In this respect, our client requests that any grant of permission for the proposed undergrounding works under the Railway Order application (as may be issued by the Board in future) be appropriately conditioned to have regard to the future road network layout on our client's site as may be permitted, under a live planning application on the site (i.e. MCC Reg. Ref. 2460334) or otherwise.

Potential for Additional Railway Station

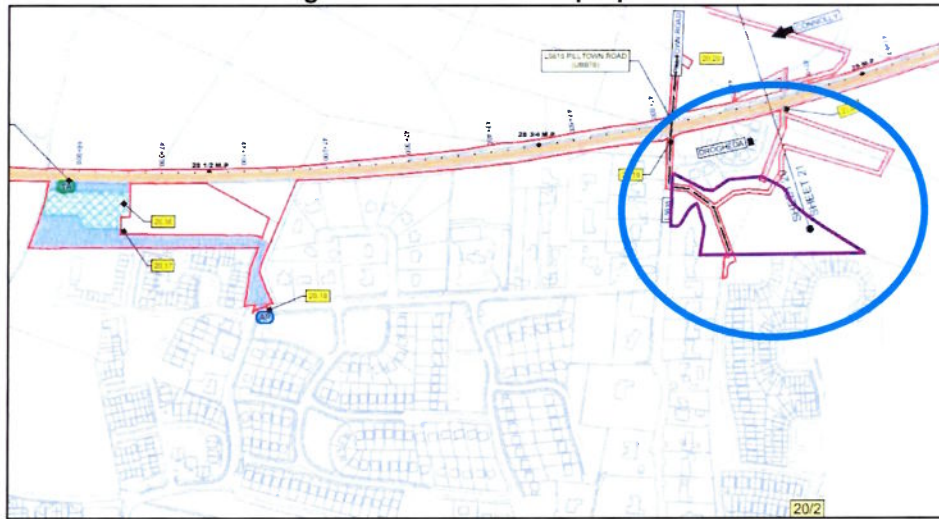
- 1.10 Notwithstanding, our client wishes to acknowledge the benefits that the DART+ North proposals will bring to the efficiency and robustness of the public transport system in this region, whilst also acknowledging the opportunities it presents (which have not been included with the Railway Order Application at present) in terms of better serving the Bettystown area to further improve its accessibility to high-quality public transport in response to its recent and potential future population growth and demand.
- 1.11 Fundamentally, our client respectfully submits that the DART+ North Railway Order application poses a significant opportunity to introduce a station along the line to exclusively serve the Bettystown area and communities living and working in the town.
- 1.12 It is put forward by our client that given the expansive growth and development observed in Bettystown in recent years in terms of population, it is no longer appropriate to expect commuters living and working in the town to travel to Drogheda or Laytown train stations in the first instance to avail of the public transport network, especially when the train line bypasses the town currently.
- 1.13 In this respect, it is noted that Policy Objective MOV OBJ 7 of the Meath CDP supports the provision of a train station at Bettystown, in addition to the existing station at Laytown, as part of the subject proposed DART+ North works, as follows:
- "MOV OBJ 7: To facilitate the provision of a train station at Bettystown (in addition to the existing station at Laytown) as part of the DART expansion works to Drogheda through the planned electrification of the Northern rail line by Irish Rail."**
- 1.14 It is important that the provision of a new train station is included so as to underpin the growth in population experienced in the area over a sustained period (see figure 2 below for location).

- 1.15 It is also acknowledged that the development of a train station at Bettystown would be in accordance with government and planning policy with regard paid to the recently published Draft Revision to the National Planning Framework (July 2024) which is noted to place a greater emphasis on Transit Orientated Development (TOD) and the opportunities it presents.
- 1.16 Therefore, it is considered that the associated location of the railway relative to the town and adjacent greenfield lands provide an optimum opportunity for the development of a railway station to serve Bettystown and further its development in this regard.
- 1.17 As a result, we set out relevant issues of concern for our client in the following sections, as they relate to the need for the development of a train station in Bettystown in response to the recent and ongoing population growth in the town, and therefore the opportunity the proposed development under the subject Railway Order presents to address same.

2.0 Location and Context of Bettystown and Client Lands

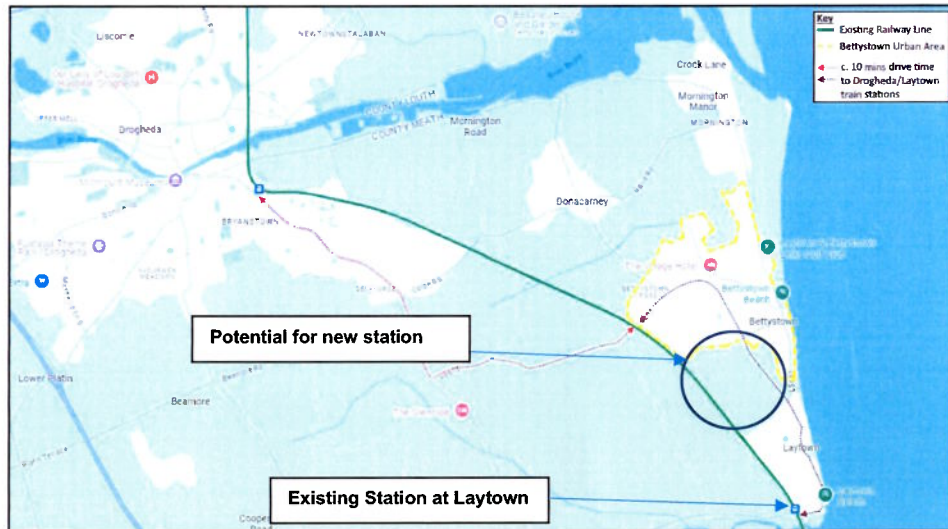
- 2.1 Bettystown is located within the administrative area of Meath County Council, c. 7km south-east of Drogheda along the Irish Sea coast.
- 2.2 The development of the town as a result of its accessibility, amenity value and its attractiveness as commuter towns to the likes of Dublin, Drogheda, Dundalk, Navan and even Belfast has led to their rapid population growth in recent years.
- 2.3 Our client is a highly renowned Irish housebuilder committed to delivering well-designed, sustainable residential homes across Ireland, particularly in the wider Dublin region.
- 2.4 In this respect, it is noted that our client has acquired lands within Bettystown and seeks to develop new, high-quality residential communities within the area in order to satisfy the accompanying demand for housing in the area, arising from the recent population growth.
- 2.5 It is acknowledged that part of our client's lands are included within the red line boundary of the subject Railway Order Application made to the Board, as per the below extract of the mapping submitted with the Railway Order application. The subject proposals seek works across our client's lands at Pilltown Road to include the undergrounding of MV infrastructure to facilitate the electrification of the nearby railway line.

Figure 1: Extract of submitted Railway Order Maps 20 & 21, showing location of our client's lands along the Pilltown Road in purple



- 2.6 In this respect, our client requests that any grant of permission for the proposed undergrounding works under the Railway Order application (as may be issued by the Board in future) be appropriately conditioned to have regard to the future road network layout on our client's site as may be permitted, under a live planning application on the site (i.e. MCC Reg. Ref. 2460334) or otherwise.
- 2.7 It is noted that the Dublin to Belfast railway line traverses Bettystown to its west and therefore acts as a hard boundary to the town's physical development and built envelope from this side.

Figure 2: Spatial Context of Bettystown, showing location of existing railway line and stations in the area



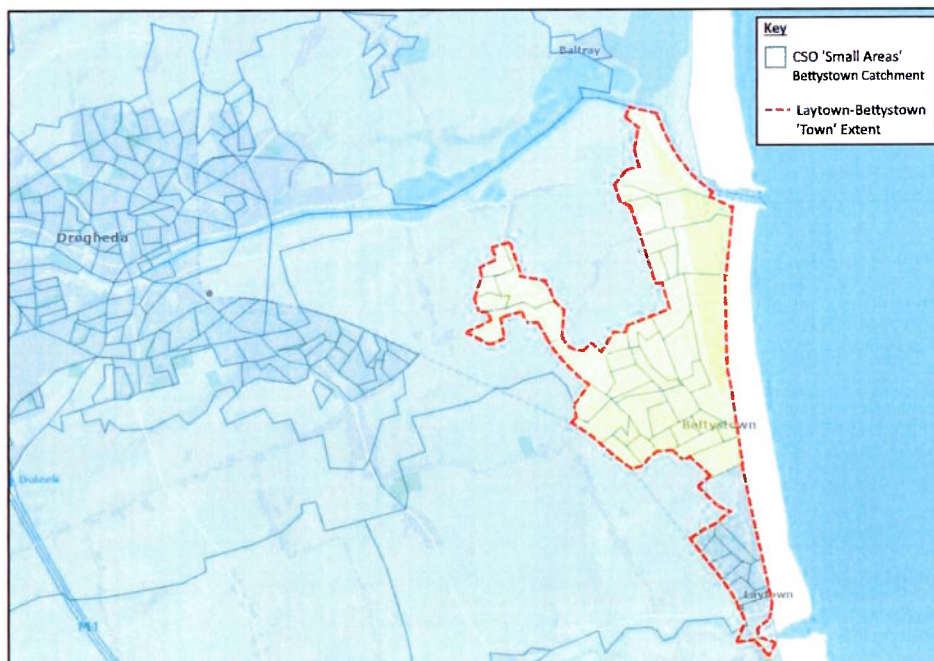
- 2.8 Notwithstanding, despite the existence of the railway line, and the expansive development of the town, Bettystown is not served by an existing train station at its strategic junction with the railway line.

- 2.9 As a result, the ever-growing population of residents and commuters from Bettystown have to travel to Drogheda or Laytown train stations in the first instance (c. 10 minute drive) to avail of public rail transport to and from Dublin or Belfast.
- 2.10 With the significant upgrades and development proposed under the DART+ North Railway Order application, it is respectfully submitted by our client that it is no longer appropriate to expect existing and future residents of Bettystown to firstly commute to Drogheda or Laytown to benefit from said improvements. This is especially pertinent when both the recent growth of the town and the existence of the railway line by the town's boundary is considered.

3.0 Population Growth Analysis

- 3.1 It is put forward by our client that given the expansive growth and development observed in Bettystown in recent years in terms of population and housing, it is no longer appropriate to expect commuters living and working in the town to travel to Drogheda or Laytown train stations in the first instance to avail of the public transport network, especially when the train line bypasses the town currently.
- 3.2 For the purposes of Census 2022 data dissemination, the Central Statistics Office (CSO) classifies Bettystown as being part of the overall Laytown-Bettystown 'town' shapefile.
- 3.3 Therefore, for the purposes of this assessment an amalgamation of a number of 'Small Areas' shapefiles were used to determine a comparative dataset for Bettystown exclusively. The following 'Small Areas' shapefiles were utilised for this purpose:

Figure 3: Spatial Context of Established Bettystown 'Small Areas' catchment and Laytown-Bettystown 'Town' extent



Source: CSO

- 3.4 The established catchment area is noted to comprise of 38 no. CSO 'Small Areas' and indicates a population of 12,518 no. people for the Bettystown area (including Donacarney and Mornington areas).
- 3.5 It is acknowledged that the overall Laytown-Bettystown area comprised 15,642 no. people on 2022 Census night. Therefore, it is noted that the population pertaining to the Bettystown catchment area of the overall town area comprises c. 80% of the total town population.
- 3.6 This is considered to constitute a significant misallocation of public transport infrastructure between the two settlements in response to population distribution, with Laytown benefiting from an existing train station (also due to be improved under the subject application) regardless of accommodating a population fewer than its neighbour which does not enjoy the same luxury.
- 3.7 As presented previously, the current expectation that commuters from Bettystown should travel (likely by car) to Laytown or Drogheda to avail of the rail network is no longer appropriate with regard to its significant, existing population and the sustainable development of the town.
- 3.8 In this regard, it is submitted that the requirement of people to travel long distances to avail of public transport is not in accordance with government and/or Irish planning policy nationally, regionally or locally in terms of the 15-minute city concept and encouraging increased active travel.
- 3.9 The development of a train station at Bettystown would encourage more people to walk and cycle in order to avail of public rail services in the area with spin off economic and environmental benefits for commuters and the area respectively, in accordance with the proper planning and sustainable development of the area.
- 3.10 Therefore, it is respectfully submitted that owing to the existing and established resident and working population in Bettystown, the introduction of a train station to serve the town is not only justified but required to sustain not only its current population but its potential future population growth also.

Table 1: Population Growth 2011-2022 in Bettystown and Laytown-Bettystown

	2011	2016	2022	Growth 2011-2022	% Growth 2011-22
Bettystown Catchment	7,504	8,175	12,518	5,014	+66.8%
Laytown-Bettystown	10,373	11,872	15,642	5,269	+50.8%

- 3.11 As per Table 1 above, it is noted that Bettystown (as per its established catchment) increased in population by c. 5,000 people between 2011 and 2022, representing a growth rate of 66.8% which is considered significant.
- 3.12 This is in comparison to the overall Laytown-Bettystown settlement area which increased in population by c. 50.8% or 5,269 no. people. In this way, it is noted that Bettystown significantly outstripped the overall Laytown-Bettystown urban area in terms of population growth, further confirming its exacerbated need for associated public facilities and amenities to maintain this growth and development in this area including public transport infrastructure.
- 3.13 In addition, it is recognised that the Meath County Development Plan 2021-2027 designates Bettystown as a 'Level 4: Self-Sustaining Town' with an envisaged additional increase in population of 1,500 people by 2027. It is considered that this

is a conservative projection, owing to the significant population growth observed within the settlement over recent times.

- 3.14 Notwithstanding, the planned population growth for the town over the next five years by the County Development Plan is considerable in the context of the overall recent population growth of the town and the simultaneous delivery of supportive services and amenities such as housing, community facilities and, most importantly in this regard, public transport.
- 3.15 Therefore, it is respectfully submitted that owing to the recent and planned for population growth of the town and, in turn, its associated demand pressures, the sustainable development and further growth of Bettystown cannot be delivered without the introduction of a train station at the town's strategic juncture with the existing railway line.
- 3.16 In this respect, a do-nothing scenario would cause further pressures and impacts on roads infrastructure, the environment and the economic costs of commuters travelling to and from Bettystown.
- 3.17 Hence, it is put forward by our client that given the expansive growth and development observed in Bettystown in recent years in terms of population, it is no longer appropriate to expect commuters living and working in the town to travel to Drogheda or Laytown train stations in the first instance to avail of the public transport network, especially when the train line bypasses the town currently.
- 3.18 Our client respectfully submits that the DART+ North Railway Order application poses a significant opportunity to develop a station along the line to exclusively serve the Bettystown area and communities living and working in the town.
- 3.19 Therefore, it is respectfully requested that An Bord Pleanála also seek the introduction of a station at Bettystown by way of requesting further information from the applicant to amend the given proposals to include same.
- 3.20 It is considered that the associated location of the railway relative to the town and adjacent greenfield lands to the east provide an optimum opportunity for the development of a railway station to serve Bettystown and further its development in this regard, in accordance with the proper planning and sustainable development of the town.

4.0 Policy Context and TOD Opportunities

Draft Revision to the National Planning Framework (NPF) (July 2024)

- 4.1 It is noted that the Government published a draft of the first 6-year revision of the National Planning Framework (NPF) on the 10th of July 2024 for public consultation, in accordance with Section 20C(5)(a) of the Planning and Development Act 2000 (as amended).
- 4.2 It is recognised that the Draft Revision acknowledges the delivery of DART+ as critical infrastructure and a key priority of the plan as a key future growth enabler for the Greater Dublin Area. In this respect, our client wishes to acknowledge their support of the principle of the development which will transform and vastly improve the connectivity between Drogheda and Dublin city.
- 4.3 In addition, as noted previously, the draft NPF revision also includes a greater emphasis on the accelerated delivery of Transport Orientated Development (TOD)

opportunities at greenfield and brownfield sites adjacent to major public transport hubs in the five cities of Dublin, Cork, Limerick, Galway and Waterford, and their metropolitan area and suburbs.

- 4.4 This is a welcome inclusion within the NPF revision and would allow for a greater justification for the delivery of residential development at or close to major public transport hubs.
- 4.5 There are a number of locations throughout the Greater Dublin Area along such railway corridors where one side of the town is underdeveloped and could provide significant levels of housing near an existing train station.
- 4.6 It is considered that Bettystown is a prime example of the above where the existing built envelope of the town abruptly stops at the rail corridor with a substantial amount of greenfield lands located on the opposing side. It is respectfully submitted that such lands are ideal for the future sustainable development and expansion of the town.
- 4.7 In this way, it is considered that the development of a train station at Bettystown would unlock the development potential of such greenfield lands, in line with the TOD concept, to help alleviate the existing and likely future demand pressures for housing development and growth in the area, arising from the observed recent and planned for population growth in Bettystown.
- 4.8 In this way, the future development of Bettystown would be in line with the proper planning and sustainable development of the town, in accordance with National Policy Objective (NPO) 10 of the National Planning Framework (2018) as follows:

“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.”

Regional Spatial and Economic Strategy 2019 – 2031 (RSES) for the Eastern and Midland Regional Assembly (EMRA)

- 4.9 The RSES sets out a regional settlement hierarchy for the EMRA area that is consistent the settlement hierarchy set out in the NPF, and also identifies a number of new strategic brownfield and greenfield opportunities for the area, including a number of sites within the Greater Dublin Area, particularly along transport corridors.

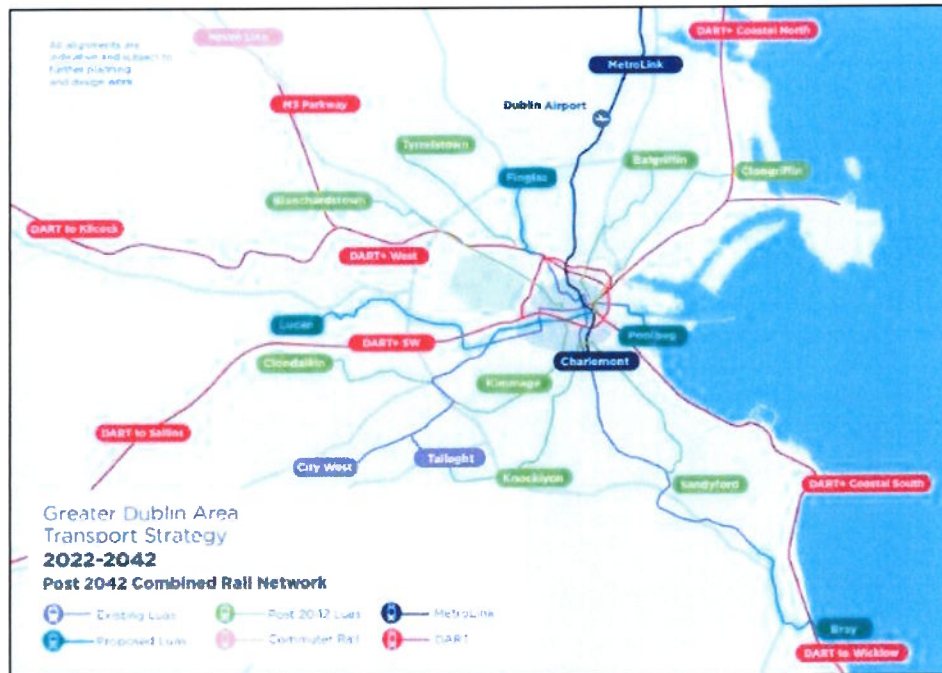
Figure 4: Dublin Metropolitan Area Strategic Plan



- 4.10 It is noted that the EMRA RSES supports the facilitation and development of the DART+ North programme of works, as outlined under the subject railway order application, which is stated to provide for “enhanced rail services on the south-eastern line... to Drogheda.”
- 4.11 Additionally, the RSES has regard to the ‘Transport Strategy for the Greater Dublin Area 2022 - 2042’ in stating that the strategy “provides a framework for the planning and delivery of transport infrastructure and services” at a regional and local level.

Transport Strategy for the Greater Dublin Area 2022 - 2042

- 4.12 The Transport Strategy for the Greater Dublin Area (GDA) 2022-2042 provides a framework for the development of transport infrastructure in the GDA over the next two decades. The strategy is an important component in the integration of transport planning policy and land use policy in Dublin.

Figure 5: Proposed Combined Rail Network in Dublin pre- and post- 2042

Source: Greater Dublin Area Transport Strategy 2022-2042

- 4.13 With reference to TOD, the Transport Strategy notes that *“in the GDA, it has been given expression in recent years by development proposals based primarily on accessibility to existing and proposed rail lines. Most notably, the Adamstown and Cherrywood Strategic Development Zones (SDZs) and the forthcoming City Edge Masterplan are based on servicing a major part of the transport demand by Luas and / or DART.”*
- 4.14 For the purposes of TOD, where development could occur at a higher intensity than would normally apply, the following locations are considered as appropriate:
- *Within 800m of an existing or proposed DART, Luas or Metro stop; and*
 - *Within 400m of a proposed BusConnects Spine route.*
- 4.15 In this respect, following the delivery of DART+ North, a series of greenfield landbanks will be appropriately unlocked in terms of their residential development potential at locations along the existing rail line including Clongriffin, Gormanstown and, most importantly in this context, Laytown.
- 4.16 In this way, it can be expected that without the appropriate and justified development of a train station to the north at Bettystown, an imbalanced and unsustainable growth strategy will emerge in terms of the overall development of Laytown-Bettystown.
- 4.17 The absence of a train station serving Bettystown would hence inhibit its further sustainable growth and development in planning terms, through the town’s inability to capitalise on TOD opportunities east of the existing rail line as a direct result of such an absence.

- 4.18 The subject Railway Order application seeking the proposed development of the DART+ North works and upgrades is considered to provide the optimum opportunity to address this deficit in Bettystown currently and form the foundations of the future sustainable growth and development of the town into the future, through Transport Orientated Development.
- 4.19 Therefore, it is respectfully requested, in accordance with the proper planning and sustainable development of Bettystown, that An Bord Pleanála seek the introduction of a station at Bettystown by way of requesting further information from the applicant to amend the given proposals to include same.
- 4.20 It is considered that the associated location of the railway relative to the town and adjacent greenfield lands to the east provide an optimum opportunity for the development of a railway station to serve Bettystown and further its development in this regard, in accordance with the proper planning and sustainable development of the town.
- 4.21 In this respect, Measure PLAN7 of the Transport Strategy for the Greater Dublin Area 2022 – 2042 is noted:

Measure PLAN7 – Transit-Oriented Development

The NTA will continue to support and facilitate the delivery of Transit-Oriented Development at locations identified as appropriate for such, and will work with EMRA and the local authorities in identifying further locations served by existing and proposed public transport which are appropriate for high density development supporting a mix of uses.

Meath County Development Plan 2021 - 2027

- 4.22 As noted previously, it is recognised that the Meath County Development Plan 2021-2027 (the CDP, hereafter) designates Bettystown as a 'Level 4: Self-Sustaining Town' with an envisaged additional increase in population of 1,500 people by 2027.
- 4.23 This planned increase in population, which is considered conservative with regard to recently observed growth levels in the town, will require additional zoned lands to accommodate the associated housing demand arising from same. With a town that is constrained for appropriately zoned residential lands, as existing, the rational expansion of the town is considered to be east of the railway line.
- 4.24 Notwithstanding, as stated, without the existence or future development of a train station at Bettystown, the development potential of the existing greenfield landbanks to the east of the railway line are somewhat sterilised in planning terms with regard to TOD.
- 4.25 Our client considers that the subject Railway Order application provides the optimum opportunity to address this issue in Bettystown currently and form the foundations of the future sustainable growth and development of the town into the future, through Transport Orientated Development.

- 4.26 In this respect, it is noted that Policy Objective MOV OBJ 7 of the CDP agrees in this assessment and supports the provision of a train station at Bettystown, in addition to the existing station at Laytown, as part of the subject proposed DART+ North works, as follows:

“MOV OBJ 7: To facilitate the provision of a train station at Bettystown (in addition to the existing station at Laytown) as part of the DART expansion works to Drogheda through the planned electrification of the Northern rail line by Irish Rail.”

- 4.27 Therefore, it is considered that the works proposed under the subject Railway Order application to An Bord Pleanála are not compliant with the Meath CDP in providing for a new train station at Bettystown as part of the proposed development.
- 4.28 As a result, it is respectfully requested that An Bord Pleanála seek the introduction of a station at Bettystown by way of requesting further information from the applicant to amend the given proposals to include same and therefore comply with the above policy objective of the Meath CDP.
- 4.29 It is considered that the associated location of the railway relative to the town and adjacent greenfield lands to the east provide an optimum opportunity for the development of a railway station to serve Bettystown and further its development in this regard, in accordance with the proper planning and sustainable development of the town.

5.0 Summary & Recommendations

- 5.1 In summary, our client supports the principle of the development which will transform and vastly improve the connectivity between Drogheda and Dublin city.
- 5.2 Our client is a highly renowned Irish housebuilder committed to delivering well-designed, sustainable residential homes across Ireland, particularly in the wider Dublin region.
- 5.3 In this respect, it is noted that our client has acquired lands within Bettystown and seeks to develop new, high-quality residential communities within the area as a result.
- 5.4 It is acknowledged that part of our client's lands are included within the red line boundary of the subject Railway Order Application made to the Board. The subject proposals seek works across our client's lands at Pilltown Road to include the undergrounding of MV infrastructure to facilitate the electrification of the nearby railway line.
- 5.5 The submission herein raises a number of issues which our client considers can be resolved through amendments to the proposed works by way of further information furnished by the applicant to the Board, and via conditions attached to any grant of permission that the Board is minded to issue in future.
- 5.6 The recommendations included in the text above are now listed as follows for the convenience of the Board.
- 5.7 We trust these will be taken into consideration in the assessment of the application in due course and our client is open to liaising with Irish Rail in respect of any of these issues:

- *It is respectfully requested that any grant of permission for the proposed undergrounding works under the Railway Order application (as may be issued by the Board in future) be appropriately conditioned to have regard to the future road network layout on our client's site as may be permitted, under a live planning application on the site (i.e. MCC Reg. Ref. 2460334) or otherwise.*
- *It is respectfully requested that An Bord Pleanála seek the introduction of a station at Bettystown by way of requesting further information from the applicant to amend the given proposals to include same.*

6.0 Conclusions

- 6.1 On behalf of our client, Greenwalk Homes Ltd., 27 Dawson Street, Dublin 2, we hereby make a submission to the DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch pending a decision with An Bord Pleanála under ABP Ref: 320164.
- 6.2 The application is being made pursuant to the provisions of Section 37 of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted) and constitutes a Strategic Infrastructure Development.
- 6.3 As detailed above, our client has concerns regarding the proposed undergrounding of MV infrastructure across their lands at Pilltown Road, Bettystown, and the absence of a train station along the existing railway line as part of the Railway Order application.
- 6.4 Our client requests that any grant of permission for the proposed undergrounding works under the Railway Order application (as may be issued by the Board in future) be appropriately conditioned to have regard to the future road network layout on our client's site as may be permitted, under a live planning application on the site (i.e. MCC Reg. Ref. 2460334) or otherwise.
- 6.5 In addition, our client submits that the DART+ North Railway Order application poses a significant opportunity to develop a station along the line to exclusively serve the Bettystown area and communities living and working in the town.
- 6.6 The introduction of a station at Bettystown would encourage increased active travel, with spin off economic and environmental benefits for commuters and the area respectively. Its establishment would help facilitate the recent and future expansion of the town population through added amenities and facilities to serve the wider area, and present further growth opportunities through Transport Orientated Development by unlocking the development potential of substantial greenfield lands to the east of the existing rail line, in accordance with national, regional and local planning policy objectives, and the proper planning and sustainable development of the area.
- 6.7 Our client respectfully requests that An Bord Pleanála takes the above submission into account in assessing the Railway Order application Ref: 320164.

Yours faithfully,



John Spain

Managing Director John Spain Associates Ltd.