

**ABP-314232**

**An Bord Pleanála**  
**64 Marlborough Street**  
**Dublin 1**



**Date:** 28th October 2023

**Ref:** 314232

**App:** Córas Iompair Éireann

**For:** DART+ West Railway Order - Dublin City to Maynooth and M3

## **ORAL HEARING**

### **INTRODUCTION:**

Firstly, thank you for inviting An Taisce to present at today's oral hearing, my name is Andrew Davies and I am a registered architect.

Firstly, we welcome the overall proposal for DART+ West, as it is a strategic priority for the improvement and expansion of the public transport network in and around Dublin.

However, in order to achieve a lasting reduction in private car use and dependence, which is one of the goals of Dart Plus programme, DART+ West needs to be integrated within a wider transportation initiative for the catchment area, which includes promotion of cycle-and-ride to upgraded railway stations.

Kind regards,



**Andrew Davies MRIAI**

**Obo. An Taisce**

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## THE EXCLUSION OF ACCESSIBLE LIFTS FROM PROPOSED CYCLING / PEDESTRIAN BRIDGES IN THE RAILWAY ORDER

According to The Centre for Excellence in Universal Design - Universal Design is defined as: the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. An environment (or any building, product, or service in that environment) should be designed to meet the needs of all people who wish to use it.

When Irish Rail chose not to provide accessible lifts on the ramped and stepped the reason given was: *Where ramps are technically feasible it is the preference of Iarnród Éireann to provide those over the provision of lifts.....This ensures that the crossing remains open at all times (24/7) and is not subject to interference by mechanical faults (i.e. lift faults).*

However a ramp, which is deemed *technically feasible* is not necessarily universally accessible, unless it is designed to meet the needs of all people who wish to use it.

We therefore assert that the Exclusion of accessible lifts by Irish Rail from proposed cycling / pedestrian bridges, which are designed to replace closed level crossings at Ashtown-Coolmine – Portestown and Clonsilla are clearly not universally inaccessible and request that the applicant be conditioned to provide accessible lifts to the proposed Cycle & Mobility Impaired Bridge at the heavily trafficked level crossing at Coolmine, which is due to close at Coolmine with no alternative access being provided and which has residential communities and amenities either side of the railway.

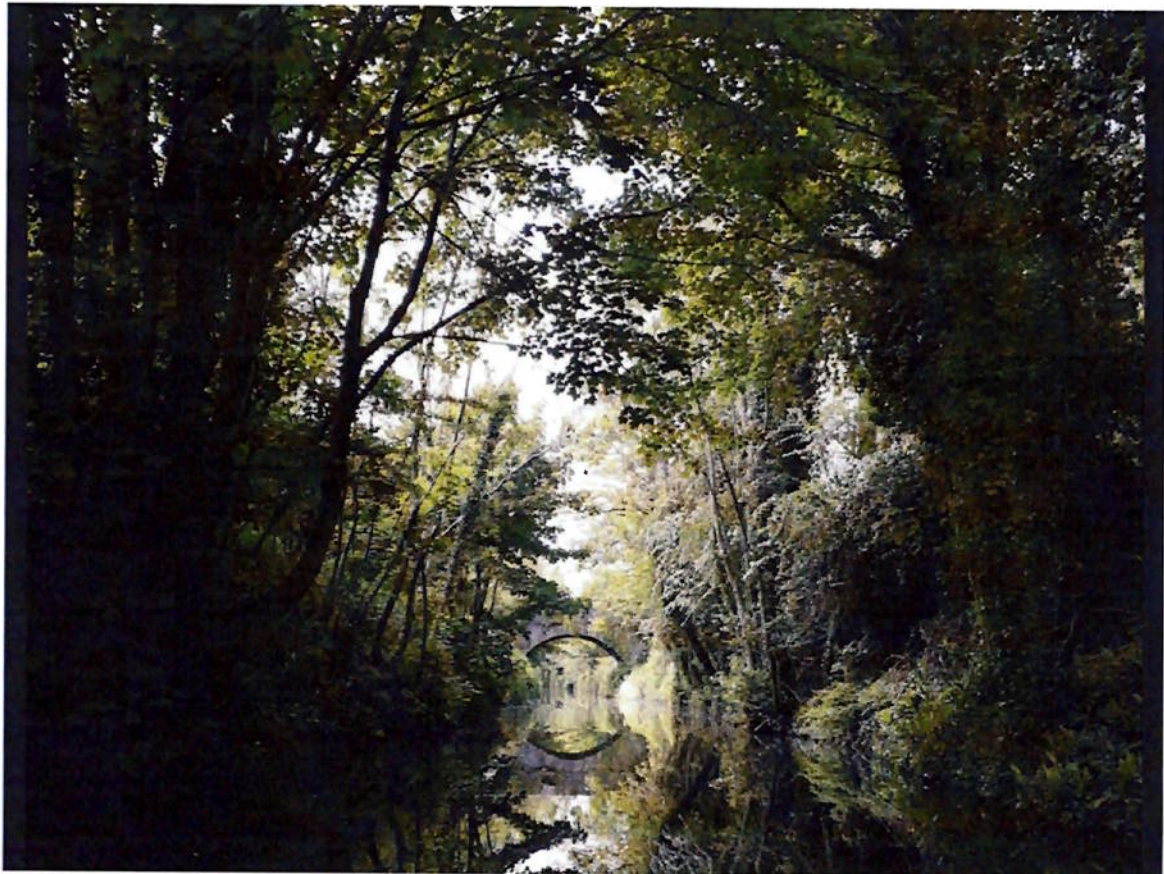
To illustrate this point – I wish to recall a Dart + West consultation webinar with local residents, which I attended in 2021, where an elderly resident, who lived just north of the Coolmine Level Crossing, expressed her dismay about no longer being able to visit her friend on the other side of tracks on foot, as she had for many years, once the level crossing was closed, as she believed that she was not physically able to traverse the proposed several hundred metre long ramped bridge. Instead, she said, she would have to drive there, via the nearest vehicular bridge at Castleknock or Porterstown, a journey of some 3 to 4 kilometres.

Rather than encouraging towards using active travel modes of transport, which is a fundamental goal of the Dart Plus program, through the omission of lifts (if not reversed) in this location, the applicant might actually be forcing residents back into their cars.

## THE DEEP SINKING

The Deep Sinking stretch of the Royal Canal runs 3.7 kilometers along the canal from Castleknock to Clonsilla railway stations. Although not mentioned in the applicant's Railway Order, the Deep Sinking is area with a high visual amenity value and a rich biodiversity and forms a linear park for the local community and visitors to the Royal Canal alike. For example, a recent biodiversity survey carried out in June 2023, found 27 types of wild flower, 20 types of birds and five species of bee,

In terms of it's history, The Deep Sinking was formed in the late 1790's, when the Earl of Leinster, who part funded Royal, insisted that the Canal be diverted to run past his residence at Carton House, against the advice of the project engineer. This led to a deep cutting of up to 8 metres being blasted through local limestone and the high cost of it's construction was one of the main reasons that the Royal Canal never made a profit.



*View of Deep Sinking taken from the canal looking west towards the Porterstown bridge, over which a six metre high, Cycle & Mobility Impaired Bridge is proposed to span.*



## **IMPACT OF CYCLE & MOBILITY IMPAIRED BRIDGES ON THE DEEP SINKING**

Three Cycle & Mobility Impaired Bridges are proposed to be constructed along the Deep Sinking. I will now examine the impact that the proposed concrete structures at Clonsilla will have on both visual amenity and local biodiversity. These are at Coolmine, Portestown and Clonsilla, which we now examine in terms of this infrastructure these will have on the Deep Sinking and its environs.

### **CLONSILLA-**

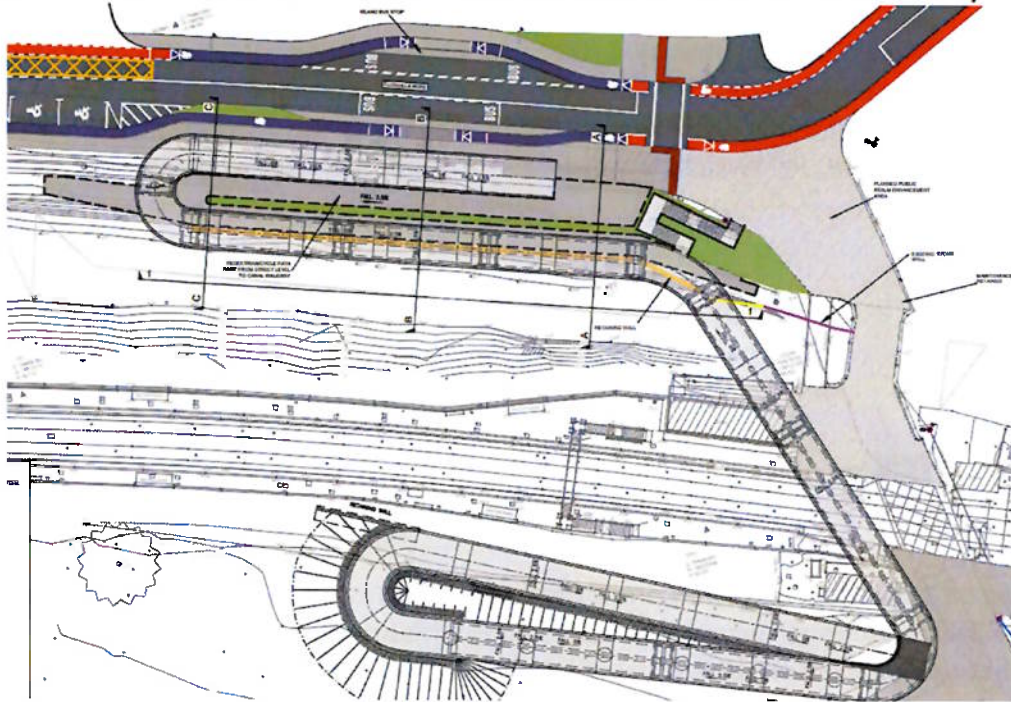
#### **PROPOSED PEDESTRIAN, CYCLE & MOBILITY IMPAIRED BRIDGE**

The bridge at Clonsilla Station is proposed to span the Royal Canal to the West of the Callaghan Bridge. With its current alignment of the proposed this concrete structure will cause irrevocable harm to both the visual amenity and the loss of all mature trees and hedgerow along the northern bank of the Royal Canal and along the Clonsilla Road

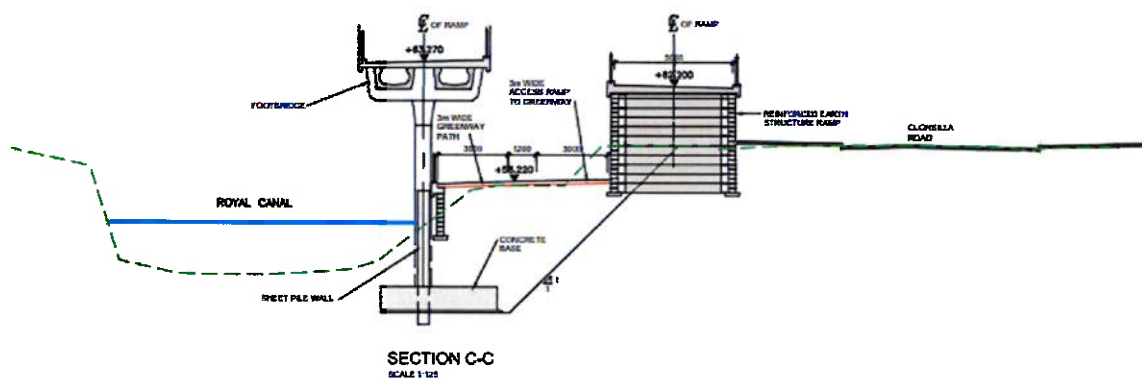


*Excerpts from 'before and after' photo montage images taken from the historic centre of Clonsilla Village and opposite the protected structure of St Mary's Church (taken from the DART+ West Railway Order Application*

The proposed alignment of this bridge will also result also result a line of four large columns along with a retaining wall, being cut into the Royal Canal (which we note is a proposed National Heritage Area) , with the unsightly and massive structure and 6 metre wide deck looming over the towpath for approximately 50 metres, which once again will cause irrevocable harm to both the visual amenity and to biodiversity of the canal and canal bank. (see excerpts taken from Dart + West Consultation No.2- vol. 3J)



Excerpt from GA Plan layout (sheet 1 or 2)



Excerpt from Plans, Elevations and Sections – Sheet 2 of 3

In order to mitigate highlighted harm which will be caused by current proposals, we recommend that the applicant be requested to re-design the northern leg of the bridge as a single run, running east – west, which can be accessed directly from both cycle and footpaths on Clonsilla Road. This re-alignment will allow for the deck and support to be moved northwards and away from the Royal Canal.

Also in order to reduce the visual obtrusiveness caused by the proposed massive and bulky precast concrete design (especially in the environs of the protected structures in this location), we request that the applicant be conditioned to adopt the visually less obtrusive and slender CORTEN clad, lightweight steel design of proposed bridges at Ashtown and Coolmine.

## **PORTERSTOWN – LEVEL CROSSING CLOSED / NEW PEDESTRIAN / CYCLE BRIDGE**

The proposed bridge at Porterstown is proposed to span the Royal Canal to the west of the Porterstown Bridge. Although we are generally happy with the alignment of this bridge we would ask that the northern leg of the bridge be moved northwards by approximately two metres to allow for screen planting along the site boundary of the Old St Mochtas Schoolhouse site, as well as for the retention of existing mature trees here. This setback will also allow for the preservation of nesting sites for Goodens (*Nomada goodeniana*) as well as Ashy Mining bees, which are both nomadic species.

Also in order to reduce the visual obtrusiveness caused by the proposed massive and bulky precast concrete design in the environs of the protected structures in this location, as per our last submission, we request that the applicant be conditioned to adopt visually less obtrusive slender CORTEN clad lightweight steel design of proposed bridges at Ashtown and Coolmine be also utilised.

Also in order to reduce the visual obtrusiveness caused by the proposed massive and bulky precast concrete design in the environs of the old St Mochtas Schoolhouse (which is a protected structure), as per our last submission, we request that the elegant and slender CORTEN clad lightweight steel design of proposed bridges at Ashtown and Coolmine be also utilised.





*Excerpts from 'before and after' photo montage images taken from the Porterstown Bridge looking towards the Old St Mochtas School House, which is a protected structure.*

## **NOTE ON BOUNDARY TREATMENTS**

In the Railway Order, Iarnród Éireann is currently proposing the installation of palisade fencing for security purposes.

An Taisce would view palisade fencing as primarily an industrial product and therefore inappropriate for use in the vicinity of the Royal Canal, which has many protected structures. Therefore we recommend that an appropriate alternative boundary treatment, such as painted steel railings, which have been installed extensively at the recently opened Pelletstown station, be selected in the place of palisade. For stretches of Dart + West, along the Royal Canal, we also recommend that visually less intrusive and more appropriate dark coloured Paladin Fencing, be selected instead of the industrial bright zinc plated Palisade system.

## **FINAL WORD**

Finally in closing we wish to thank An Bord Pleanála for inviting us to present to this Oral Hearing and wish to re-iterate that An Taisce fully supports the Dart Plus program and make comments today with the sole purpose of making Dart + West a more inclusive and sustainable project.

We also ask that the Planning Inspector, who is leading this hearing here today, give due consideration to the recommendations, which I have presented, and if they are considered valid and beneficial to the development of the Dart + West project, An Taisce would ask that our recommendations be included in the Inspectors Final Report to An Bord Pleanála.

Thank you for your attention.

Andrew Davies MRIA  
Obo. An Taisce

28/09/2023