

**Document for Oral Hearing 27/09/2023**  
**Presented by Christopher Reid**

Good morning/ afternoon. I would like to thank you for arranging an oral hearing. I would also like to thank you for inviting me here today. I would also like to thank our public representatives for taking the time, despite their busy schedules and in some cases having to take time off work, to make known their feelings about the proposed project.

I would like to put it on record, from the outset, that I want this project to succeed. I have lived beside the railway all my life and like most people, I love the sound and sight of trains. I would also like to clear up any ambiguity that may exist. I am totally opposed to the severance of the old and established Ashtown community and the new Rathborne community by closing the level crossing. I am also opposed to a new road being built at Mill Lane on our land. I am also opposed to any of our land being confiscated and to any construction no matter how minor, taking place on our land. I am totally opposed to a tunnel being built in the vicinity of The Stables. I am also totally opposed to any interference, no matter how small, that will threaten the viability of The Stables or the safety of the children that use it.

**Page 8/9: deals with the: Closure of level crossings not required.**

This is where I will begin my detailed response to IR'S response, contained in their document submitted to An Bord Pleanála. (Where practicable, I have copied and pasted from IR'S narrative, for clarity and emphasis I have used italics. Wherever I have added to IR'S narrative I have used the same font that I have used throughout my response in order to avoid confusion).

**On page 9** in their document IR tells us, and I quote:

*<sup>1</sup>The removal of the level crossings will improve train efficiencies, will enhance safety, and will remove the delays caused by the road / rail interface. Their closure will also remove the periodic blockages on the road system, which are currently very pronounced, especially in the morning and evening peak commuter periods.*

This extract from their document is littered with inaccuracies. I will focus on three points to highlight the inaccuracies.

(1) IR are lumping all level crossings together. By using this method, if they feel that one of the level crossings interferes with their proposed project they then assume

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<sup>1</sup> All text taken from the CIE/IR/ROD/IDOM'S original document will be printed in Italics. Any alteration to the original document will be printed in a similar font to our response document.

that all of the level crossings interfere with their project. No two level crossings are the same. If they were all the same, then there would be no need for IR to propose different solutions for each level crossing. IR will have to take each level crossing on its merits. If IR did that they would find that the economic cost and the disruption that the proposed project would entail, would overrule the necessity to close all of the level crossings. IR are probably of the opinion that if they make an exception for any of the level crossing, their whole project could implode.

(2) If we examine Ashtown level crossing we will see first hand the folly of trying to close it. Travelling from the south, the Ashtown Road (which for in record is built on The Stables land) bisects the level crossing, crosses over the canal and lands in the centre of the shopping mall and Rathborne Estate. Ashtown Road is a narrow road and contrary to what IR tells us, the vast majority of the traffic using the road is local and mostly used by those that need to use it. The narrow road is not subjected to periodic blockages and delays, as claimed by IR. There are longer delays caused by the traffic lights at the Navan Road/ Kempton junction, or at the two sets of pedestrian lights on the N3. In my years using Ashtown Road I have never had a problem with the traffic. There is nothing exceptional about the number of cars that use this road in the morning or in the evening. At night and at weekends there are very few trains using the railway and very few cars using the road. One of our entrances goes directly onto Ashtown Road and there is never a problem with the traffic. Now that businesses are supporting employees in a hybrid work model, there has been a noticeable drop in the number of cars that use Ashtown Road and in the number of people using the trains.

(3) Ashtown Level Crossing is unique. It is set in what has now become the centre of two communities. The developers that built Rathborne were the first to highlight the need to integrate the community that they were about to create, with the established Ashtown community. They applied for and received permission to change the land that they proposed to build the new houses on from Dublin 11 to Dublin 15, the area that the established Ashtown Community was on, in order to avoid separation or distinction.

Because of the unique nature of Astown level crossing it is ideally placed for an automatic set of barriers. The set that IR uses at the level crossing in Killucan takes ten seconds to rise and ten seconds to lower. Will automatic barriers work at Ashtown level crossing? There is only one way to find out. IR have nothing to lose and everything to gain. Automatic barriers are the most economical way to solve the problem at Ashtown Level Crossing. Spending a large proportion of their 1.1 billion euro budget in order to divide a community and build a tunnel, a road, a cycle lane, and a roundabout does not make sense. The authorities in Belfast are trying to bring the communities together, IR are doing the opposite, they are trying to divide communities. It is inevitable that designing and constructing a project of this size and complexity oversights and the unforeseeable problems will crop up from time to time

and the public good can get lost in the finer detail. The proposed closure of Ashtown level crossing needs to be revisited. Having a conversation with a Dail Public Accounts Committee, might be a way out of the impasse that IR now find themselves in. Such a committee would be well placed to scrutinise the pros and cons of the project and are better placed to protect the communities that they are elected to serve and give a detached and impartial opinion.

### **Page 12 deals with the: Train demand figures.**

An extract from **page 12** tells us and I quote:

*A correct analysis of passenger demand trends requires observation over long periods of time. Annual or biannual fluctuations do not necessarily reflect actual changes in long-term trends. For this reason, future projections are adjusted based on regional demand models and not on specific values in a given year. Future changes in the usage trends of different modes of transport, new projects being planned (included in certain analysed scenarios in the model) and the implementation of Project Ireland 2040 mean that the use of the rail network will increase in the coming years.*

The staff at The Stables are well placed to give an updated analysis of train demand trends. We have been observing the number of people using the trains over a long period of time. IR tells us that, quote: *the implementation of Project Ireland 2040 (means) that the use of the rail network will increase in the coming years.* That is wishful thinking. An impartial observer would tell IR that the number of people using the train is decreasing. More and more people are now working from home. With modern technology there is no longer any need to go to the office every day. Look at the consultations that IR held on the Dart+West project. How many people had to travel to attend them? None! It was all orchestrated using modern technology.

For a growing number of people nowadays, there is no need to go to the office everyday. This is reflected on the roads and on the trains over the last four years. The trains going through Ashtown every Friday, Saturday, Sunday and Monday and bank holidays are way below capacity. That, unfortunately for IR, is the reality, Luas and Bus are now the preferred mode of transport for most commuters. CIE/IR were given every opportunity in 1962 to develop their service. The government of the day gathered together Ireland's state, semi state and entrepreneurs and explained to them their vision for the future of the country and published a document to back it up.<sup>2</sup> They followed up this brave move with free education in 1966 and we joined the

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<sup>2</sup>AN BILLE RIALTAIS AITIUIL (PLEANAIL AGUS FORBAIRT), 1962. LOCAL GOVERNMENT (PLANNING AND DEVELOPMENT) BILL, 1962. BILL entitled AN ACT TO MAKE PROVISION, IN THE INTERESTS OF THE COMMON GOOD, FOR THE PROPER PLANNING AND DEVELOPMENT OF CITIES, TOWNS AND OTHER 10 AREAS, WHETHER URBAN OR RURAL (INCLUDING THE PRESERVATION AND IMPROVEMENT OF THE AMENITIES THEREOF), TO MAKE CERTAIN PROVISIONS WITH RESPECT TO ACQUISITION OF LAND, TO REPEAL THE TOWN AND REGIONAL PLANNING 15 ACTS, 1934 AND 1939, AND CERTAIN OTHER ENACTMENTS AND TO MAKE PROVISION FOR OTHER MATTERS

EEC in 1973, these three decisive steps paved the way for the modern country that we now live in. ESB got off the mark with government prodding and financial assistance. They took advantage of high unemployment, cheap labour and materials. They also took advantage of the engineering firms with empty order books, who ended up cutting each other's throats in order to stay in business. These favourable conditions allowed ESB to build up a formidable array of electricity generating power stations. CIE/IR for whatever reason missed the boat. They are proposing to go ahead with their project when the country is facing a labour shortage and the cost of labour, materials and land has never been higher.

Over the years, IR has done little to add value to the railway system, other than adding some electric cables, to cater for the Dart system. Using the present business model and giving IR 1.1 billion euro of taxpayers' money to try and revive the railway, might not be the right answer. I want this proposed project to succeed, but I continually ask myself: Are we throwing good money after bad? If the proposed project is to be a success and come in under budget and the railway is to become viable IR needs to adopt a different approach. When problems crop up, they need to be dealt with rationally. IR hoping that the railway order will provide them with a silver bullet, is not the way forward. Have IR been given an insurmountable task? I hope not, but only time will tell.

**Page 16 2.2.16 deals with: Community Infrastructure and Severance.**

Below is IR'S response:

*Chapter 7 Population of the EIAR assesses community severance. Section 7.3.4.4 of EIAR Chapter 7 states that severance often occurs as an impact due to transport infrastructure development such as roads or bridges. Its effect is to discourage community interaction and it occurs where access to community facilities or between neighbourhoods is impeded by a lengthening of journey time or by physical barrier(s).*

I totally agree with the statement above and it is worth reading twice. The passage that I have just read is exactly what the community has told IR. That closing the level crossing will discourage the community interaction between Rathborne and Ashtown.

The above extract from IR document is followed up with and I quote:

***(On the other hand, relief from existing severance may be provided by a new road or bridge)***

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The response to that statement is quite obvious. There are no existing severances. And it follows that there is **absolutely no need for relief from them**.

The document continues and I quote:

*where traffic volumes or speed are moderated, by the inclusion of crossing facilities in the design or through the presence of over-bridges and/or underpasses. Sensitive groups are identified specifically where they comprise a higher proportion of pedestrian journeys or where specific amenities are associated with these groups. Sensitive groups can include young and older population cohorts, the mobility impaired, and people at risk of social isolation. Relevant community facilities can include schools, recreational amenities, surgeries, hospitals, churches, post offices and shops. Section 7.5.1 of EIAR Chapter 7 provides an assessment of the 'Do-Nothing' scenario which assumes the proposed development is not built. Combined with the existing poor journey characteristics and journey amenity the current conditions will continue and worsen resulting in increased delays to the population accessing community facilities/services. The ongoing conflict at the road rail interface at level crossings will worsen, increasing congestion levels for all modes (vehicles, walking and cycling) and will cause the grelevel of perceived community severance which would have a negative impact on all populations, particularly vulnerable groups, including the young, old, and people with reduced mobility or disabilities.*

The following is my response to the above contrived piece of nonsense.

The setup that exists at Ashtown Level Crossing, considering the area that it is in, is fit for purpose. **The do nothing scenario** is the one that is best suited for Ashtown. The sensitive groups that have been identified above are better off with the present setup. IR should never be allowed to build, under any circumstances, an artificial barrier separating Ashtown from Rathborne. The present setup is far superior to anything proposed by IR.

I will pause for a moment and consider what IR proposes for what they term and I quote: '**older population cohorts**'. This is another name for old fogies. This is the same generation that chose not to emigrate, but stayed in Ireland, worked hard and built the country that we now enjoy. Does IR consider old fogies to be past their sell by date? And cutting their community in two is good enough for them? Are old fogies destined to spend the rest of their days looking out their front window, hoping that on the off chance someone might drop in and say hello? Or should they, as is their constitutional right, be allowed to ramble anywhere they choose in their neighbourhood, without having to put on climbing boots every time they have to go to the post office, want to buy a paper or need a bottle of milk.

**Pages 24/25 2.4.3. Deals with: Impact on Horses and Stables.**

IR in their response, number off five points that they feel will address the impact their proposed project will have on the horses and stables. I will carefully analyse what they have to say, before I do that I will remind everybody why I am here today. I don't want to be here. When IR decided to demolish The Stables, they did so without bothering to consult the owners. The first that we heard of their plan was when a local politician delivered his flyers into the estate beside The Stables. An IR photo displayed a green field where The Stables were situated. A lady from the estate asked me where we were moving to. I had no idea what she was talking about until she showed me the flyer. The response from our clients, the local community, the local politicians and our overseas friends, was immediate. In total we had six and a half thousand supporters and the **Save Ashtown Stables** campaign began. I have to admit I did not see support of that magnitude coming and neither did IR. They initially backed off, took a deep breath, re energised and started over again. I can tell you without fear of contradiction it was business as usual for IR. The second time around they were more determined than ever to demolish The Stables. They adopted a different approach this time and have set about their task, by trying to make The Stables inoperable. IR this time around are attempting to use the tried and trusted method of '**death by a thousand cuts**'.

From day one we have told IR that for the service we provide we needed every inch of land that we own and anything less would make The Stables unviable. That it would be impossible to operate a riding stable in the middle of a multi-million euro construction site. That statement could not have been clearer. The Stables is operating on the bare minimum amount of land required. This should have been to the fore in their summary of issues that I am about to address, but it isn't, it did not make it on to the list. They are attempting to get around this by completely changing the narrative and I quote from their document:

*1. Concerns about the reduction of footprint at Stables in relation to grazing land.*

As I have already pointed out, that was never our main argument. The response to the above extract was to talk about percentages, fractions and the management and spraying of paddocks. Nothing to do with the viability of The Stables.

I will move on to their second point and I quote:

*2. Construction works threaten the safety of their horses and people as well as affecting the enjoyment of this amenity*

IR'S response to that extract is to tell us that the significance of the proposed development's **'impact is deemed moderate'** and deemed to be **'Not Significant'**. No mention of 'horses and people' or no mention of and I quote: **'affecting the enjoyment of this amenity'**. They completely fail to respond to their own response. Throughout their narrative they consider that a **'no response'** is an appropriate answer. A no response to any of the important issues that we have raised is not an answer and needs to be called out for what it is and highlighted.

I will move on to their third point.

3. *Construction works around and within the Stables would render the Stables inoperable and force them to close.*

When it comes to fleshing out their response to this issue, it is more of the same. Again they ignored the issue and went off on a tangent and mentioned, and I quote: **'Construction and Environmental Management Plan'** together with **'the appropriate mitigation and monitoring controls as provided by the respective competent experts, are identified in the CEMP.'** IR completely ignored the issue that they chose to bring up and in the process, obfuscating instead of giving an answer.

I will now deal with their fourth point.

4. *Impact on Wildlife & Horses* - states that IE have made no suggestions or proposals as to how the horses will live during the construction, which can leave the Stables inoperable.

IR have taken a little time with this response and in doing so have made the case as to why their proposed project for The Stables is bound to fail. They tell us that and I quote: *Ashtown Stables is located in a busy urban setting. That is true. The sand arena is adjacent (to the) main Sligo - Dublin railway line with a variety of rail traffic and associated (with a) wide range of visual and auditory stimuli. Ashtown Road (L3101) passes in close proximity to the sand arena and when the level crossing is currently closed to traffic, there is significant traffic queueing with a variety of engine noises and exhaust fumes. The horses and ponies that are used to provide the trekking experience in the Phoenix Park have to travel a distance of approximately 550m involving a journey along the Ashtown Road, crossing the N3 and traversing the R806 to access the Phoenix Park.* The above narrative is misleading and untrue.

For reasons best known IR they have deliberately left out a lot of important information that would show The Stables in a good light. IR tells us that the sand arena is adjacent to the railway line and subjected to visual and auditory stimuli. IR fails to mention that the arena is two metres lower than the railway line and is also below the road. There is also a three metre high granite wall, a hedgerow, a right of

way and the otter pond also known as the mill pond, separating the arena from the railway line. What they also fail to mention is that the otter pond is owned by IR. Further along in the narrative they refer to the otter pond as a car park. When I was young I spent many an hour watching the otters with their young swimming in what they refer to as a car park. In my lifetime I have never seen it used as a car park. You would park your car in the otter pond at your own risk as it is riddled with sinkholes. To the east of the arena is a hedgerow separating it from the Ashtown Road. And to the west are the stables, ancillary buildings and the mill, thereby giving the arena a snug and warm feeling and making a big hit with all the local kiddies. It is the complete opposite to what is portrayed by IR.

The next paragraph of their response goes on to praise The Stables I quote: *The horses and ponies resident in Ashtown stables have shown remarkable adaptability to date and would be expected to continue to adapt. These horses and ponies live and work in an urban landscape with continually changing visual and auditory stimuli. They have been bred over many generations to deal with the hustle and bustle of urban living. They have been excellently brought along by the experienced horsemen and women in Ashtown Stables and with the continuation of the skilled management of horses and ponies in a continually challenging environment.*

It begs the question: If The Stables are so good, why are IR trying to demolish it? The narrative then continues with, and I quote:

***'the current horses and ponies in Ashtown Stables will adjust to the new stimuli associated with the construction activity as they have done so many times before.'***

I am at a loss as to when the horses and ponies have done it so many times before.

The next piece begins with IR telling us that and I quote:

*In relation to the works associated with the tunnel there is **significant anecdotal data** that shows that it is the combination of noise and visual stimuli (that) have the most profound impact on sudden unpredictable equine behaviour.*

What does that mean? We know that **significant** means important or consequential and **data** means evidence, intelligence and documentation, but, **anecdotal** means unscientific and unreliable, the complete opposite to **significant** and **data**.

The next piece is used in an effort to to minimise the noise and disruption that will be caused by the proposed construction and I quote:

***The old mill, ancillary buildings and stable complex are very well located to minimise the construction activity at the northern end of the proposed***



***construction works and the two areas that are exposed are the proposed roundabout at the southern end of Mill Lane and the proposed footbridge and Ashtown Road redevelopment at the north-eastern aspect of the sand arena.***

The mill, the ancillary buildings and the stables noted in the above piece are beside the arena. However, there was no mention of them acting as a barrier, when IR were describing the arena but when it suits the narrative, they are brought into play. The short extract above is their sum total of how they propose to deal with the construction of the road, the roundabout and the bridge: a major piece of engineering and of course the tunnel. IR have used just five lines in their narrative, to explain away how a multi-million euro project will affect the horses, the staff and clients at The Stables.

**Pages 31/32 deals with Cultural heritage not adequately mitigated, and I quote:**

*In relation to the Ashtown Stables, the buildings on the property are not included in the Record of Protected Structures (RPS) nor in the National Inventory of Architectural Heritage (NIAH). The proposed development would take a **sliver of land** from the stables but would have no direct impact on the buildings. In relation to the wider Ashtown area, EIAR Chapter 21 Architectural Heritage recognises that there would be some significant negative impacts on architectural heritage in the Ashtown area and proposes mitigation as far as is practicable.*

Some of the stables are hundreds of years old and built on shallow foundations and, we are told, they are excluded from the Record of Protected Structures. Do IR now feel that they have a licence to do what they like to them? The horses that are in those stables and the staff that work them, are they now at the whims of IR and their agents? They also tell us in the narrative that they would **take**, (the use of the word **take** is instructive) a **sliver** of land from The Stables, they liken it to cutting a piece of cheese. That **sliver** of cheese turns out to be 14.05% of The Stables land. Which is contrary to the wishes of An Taoiseach Mr. Leo Varadkar who requested that the project should be conditional on minimum disruption. And on that **sliver** of cheese they propose to build a 1.5m rubbing strip, a 6.5m carriageway and a 3.65m cycleway. The arrogance of IR attempting to take The Stables land, to build a cycle track for another sporting body, a completely new road and a roundabout on our land. This is a clear case of IR clearly attempting to overstep their remit.

**Page 34/35 deals with: Flood risk at Ashtown/Martin Savage.**

*Response to issue raised Flood risk at Ashtown was considered as part of the Scheme Flood Risk Assessment and Hydrology Chapter of the EIAR. As noted in table 10-4 of the EIAR Hydrology chapter, the proposed (1) tunnel at Ashtown is*

outside the floodplain of the river Tolka. It should be noted that subsequent to the Tolka flooding of (2)1954 significant modifications have been made to the main channel floodplain and estuary to reduce flood risk throughout the catchment. Studies undertaken of the River Tolka as it is today, indicates that flooding (in a 1 in 1000 year event) from the Tolka is ~80m away from any works proposed for the DART+ West project.(3) As such, fluvial flood risk is estimated to be low at this location. A new carriageway drainage network is to be provided and connected to the (4)existing surface water drainage network. The preliminary design assessment of the existing and proposed surface water drainage networks has found that the proposed drainage will be able to discharge by gravity to the existing surface water drainage network to the north. The carriageway drainage network has been designed in accordance with the appropriate standards to remove excess water from the carriageway for a specified storm duration and prevent ponding or additional rainwater collecting at the bottom of Mill Lane. Following completion of the works, the carriageway and associated infrastructure will be handed over to the Local Authority for operation and maintenance. Regarding the existing flooding at Martin Savage Park, information contained within the SSFRA was collated from various sources including the OPW's record of historic flood events and consultations with Dublin City Council drainage division. **No indication of flooding at Martin Savage Park was presented in the consulted sources.**

The flooding appears to be derived from deficiencies in the surface water drainage network within (5)Martin Savage Park. Irish Rail will liaise with Dublin City Council during the detailed design stage to confirm (the) cause of flooding and facilitate remedial measures by Dublin City Council.

I have added numbers to the various points raised in the above narrative ( please note that there were no numbers on the document forwarded to An Bord Pleanála by CIE/IR/ROD/IDOM.) and answer each one of points that I have raised below.

- (1) IR have finally admitted that they propose to build a tunnel.
- (2) For those that were not alive in 1954, it was the worst flood that I can ever remember. There was a sea of water stretching from the Tolka Valley to The Royal Canal.
- (3) The level of the finished floor of the tunnel will be below the level of the River Tolka. IR, despite numerous requests, has refused to provide the FFL of the tunnel. The top of the granite canal wall to the left of Longford Bridge, looking north, provides a fixed point for taking levels and it is from this granite fixed point that I will begin.(unless of course, that is a better fixed point) From that granite fixed reference point it is 5.4 metres to the base of the canal. (The depth of the water in the canal can also be measured from the granite fixed point.)The FFL of the tunnel is 7 metres below (this is the figure given at a webinar by IR) the base of the canal, which gives

a measurement approximately 12.4 metres below the granite fixed point. This confirms that the level of the rain water flowing from the proposed tunnel will be below the 1954 levels. Stating that there is an 80m distance between the Tolka and the work site is disingenuous, water will find its own level irrespective of the distance, be it 80 metres or 80 kilometres.

(4) What existing **surface water network** is IR talking about? There is no existing surface water network at Mill or anywhere near the level crossing. I would suggest that they speak to Conor, the former engineer with Fingal Co. Council or his foreman Billy. The person that wrote the above piece, will need to revise his interpretation of the surface water network.

(5) In the detailed analysis that I presented to IR I took time out to explain some of the reasons as to why Mill Lane continually floods and to the east of the level crossing. Handing over a major drainage problem, to an unsuspecting Dublin City Council, is a recipe for disaster.

**Page 74/75/76/ deals with: Ref. No. -LO013a-Christopher Reid.**

The following quote is from IR'S response document:

*In relation to the area being used for mares and foals, while CIÉ's expert has not met directly with this landowner, his opinions are based on observations from a visit and inspection immediately outside the property, his knowledge and experience of normal stable and pasture management and a further examination of the property and environs via Google Earth. Ashtown Stables is a single unit, roughly triangular in shape, extending to approximately 3 acres. The stables are bordered by the main DublinSligo and Commuter belt twin track railway line to the North, to the east by the L3101 and to the west by Mill Lane. Ashtown Stables consist of approximately 2.2 acres of paddocks to the south, one containing an old trailer and numerous muck heaps. In the northernmost end of the premises the stable yard has been developed.*

*Teagasc advise that 0.6 hectares (1.5 acres) is the optimal requirement per adult horse and generally, a minimum of 2.5 acres is advised for a mare and foal. In the absence of any land use information provided in conjunction with landowner engagement, it is considered unlikely that the grassland area is suitable in terms of size and location for mares with foals. A mare and foal could be grazed on the land intermittently but to properly nurture a foal, the foal should be turned out into a large paddock to allow the foal to exercise freely, away from traffic, noise and the possible pollution from the L3101.*

*The extent of land acquisition is not considered to significantly alter the ability of these lands to function as they currently do.*

IR expert makes reference to Teagasc. Teagasc are not in the business of running riding stables and have never claimed to be. The expert's analysis of a riding stable in a European Capital City completely misses the point of what we are about. And I will respectfully disagree with him. In his analysis he also maintains that we do not have enough land at Ashtown, on this point I am forced to agree with him. On the one hand he tells us that we do not have enough land and on the other hand he tells us that it is okay if IR confiscates 14.05% of the little land that we do have. Once again, I will respectfully disagree with him.

#### **Page 77**

I will quote again from the narrative:

*The provision of a cycle track and a roundabout at Ashtown is considered wholly aligned with the objectives and aims of the project.*

Am I to take from the above narrative, **that whatever is considered wholly aligned with the objectives and aims of the project**, can be confiscated? Needless to say I **totally disagree**.

I will quote from the narrative again:

*If the cycle path was removed a footpath or shared space of similar width would still need to be provided to meet pedestrian and cycle requirements.*

To be quite honest, I have a problem trying to get my head around that statement. Why are The Stables being tasked with providing the new pedestrian and cycle requirements for the area? The Stables own the Ashtown Road, a road that has served the public for over one hundred years. IR have decided that they want to close it to through traffic and confiscate 14.05% of The Stables land and leave The Stables inoperable. They are not content with replacing like with like and replacing a four metre road with a four metre road they have decided to confiscate The Stables land and become road builders. IR proposes to build a six and a half metre carriageway, a one and a half metre rubbing strip and a three point six five metre cycle lane on land that they do not own. Without the slightest regard for the owners of the property and the sterling work that The Stables carry out and the unique service that they provide.

#### **Page 64 and I quote:**

*The submission states the landowner is concerned about the reduction of footprint at Stables in relation to grazing land.*

Is this another attempt to change the narrative? This statement is totally untrue and another attempt to make the size of the footprint the main bone of contention. We have stated from day one that if the proposed project goes ahead, then it will result in the demolition of The Stables. What do IR not understand about our position?

**Page 67**

*Summary of issue raised – The submission claims that construction works around and within the Stables would render the Stables inoperable and force them to close.*

*Summary of issue raised – The submission claims that the Stables are a valuable local amenity which would be affected by the project. (Thereby causing it to close.)*

Neither of the above issues were addressed in a meaningful or significant way.

**Page 69 refers to Brent Geese and I quote:**

*The use of the grassland in the Ashtown Stables was highlighted in submissions from the owners of the Ashtown Stables and investigated by Iamród Éireann. **A desk-based assessment was undertaken to assess the suitability of the grasslands at the Ashtown Stables for Brent Goose.** The suitability of inland feeding sites by Brent Goose depends on a number of factors. Studies have shown geese to preferentially select grassland with sward heights of approximately 6 cm in height. Other factors determining the suitability of an inland feeding site include the size of grazing area, type of grassland management, visibility and disturbance. Brent Geese prefer large, open sites where they have clear sight-lines. The need for safety is more important than food supply in influencing where geese feed, **with birds feeding mostly in large, open areas** and avoiding closed situations or sources of frequent disturbance. **Although it is not disputed that Brent Goose may use the grasslands at the Ashtown Stables,** particularly because it is situated beside a feeding site of Major importance and may have optimum sward height, it is considered that the Ashtown Stable lands do not provide ideal feeding habitat for Brent Geese, because the site is approximately 50m x 150m, intersected by fences with trees and surrounded by treelines on all but the north side. Therefore, it is not considered as being of the same level of importance for brent geese.*

I have highlighted two phrases from the above piece that I have just read '**with birds feeding mostly in large, open areas**' and I have also highlighted '**it is not disputed that Brent Goose may use the grasslands at the Ashtown Stables,**'

When I read the above piece my first reaction was that The Ashtown Brent Geese must be geese of a lesser god. I know that IR do not like me and with good reason. I had to point out to them that they are trying to deprive me of five of my constitutional rights:

(1) My right to be held equal before the law.

- (2) My right to express freely my convictions and opinions.
- (3) My right to protect my family.
- (4) My right to the private ownership of external goods.
- (5) My right to an adequate means of livelihood.

Despite our difference there is no need for them to take it out on the Brent Geese. Wildlife in the modern world is dwindling at a frightening pace. State and Semi-State Bodies are obliged by law to lead by example. With IR is a case of do as I say, not what I do? Apart from the legal restraints that the Oireachtas and the EU places on IR, surely as human beings and custodians of the planet for the next generation, we all have a moral duty to protect the environment and the wildlife that depend on it. The best that IR can come up with is a **desk-based assessment**, whatever that is. At The Stables we do '**boots on the ground assessments**'. (this is where you spend the best part of your life observing nature closeup and passing on what you learn to the next generation) The following are just a few of the standout points and interesting things that we have found out about the Brent Geese at The Stables.

(1) When the geese land at The Stables, sometime after travelling thousands of kilometres, they are usually hungry and I have never seen them take time out to measure the grass and check that it corresponds with IR **desk-based assessment**, before they start eating it.

(2) The Stables has proven over a long period of time to be a unique oasis in a European Capital City. It is surrounded by hedgerows and provides shelter for a large selection of wildlife (we have provided IR with the complete list of wildlife at The Stables, perhaps they might be good enough to make it public.) One of our favourite visitors is the Brent Goose. Watching the geese feeding it would appear (we can never know for certain) that the shelter that the hedgerows provide, does not prove to be a barrier to the geese visiting The Stables. And may offer them protection from bouts of extreme weather.

(3) In the animal and plant world forming symbiotic relationships is the key to survival. Horses have a keen sense of smell, sight and hearing. At the first sight of danger, or perceived danger or anything out of the ordinary, they raise their head and look, listen and smell. The alertness of the grazing horses will not be lost on the geese and provides them with an early warning system.

**Page 164/166 Response to submission again I quote:**

*12. From a review of Ashtown Stables website, (another desk top study?) it would appear that Ashtown Stables give riding lessons in the outdoor school and has organised treks in the Phoenix Park. Research on Ashtown Stables practices shows that the horses appear to have been ridden on the local roads to access the Phoenix Park - this is a distance of approximately 550m along busy urban roads which*

*required trekking along the Ashtown Road (R147), crossing the dual carriageway at the N3 /R147 trekking up the R806 before entering the Phoenix Park at the Ashtown Gate. In the professional **experience of the equine expert**, it is remarkable that horses are still ridden along this particular route. If confirmed, this is further evidence of their **biddable and docile** nature and therefore, it would be expected that if these horses can traverse the route between Ashtown Stables and the Phoenix Park, they would be able to adapt to walking through the proposed underpass, to the west of the Old Mill.*

Once again I am reluctantly forced to respectfully disagree with IR'S equine expert. When teaching children how to ride and care for horses, in my opinion, there is no such thing as docile and biddable horses. A kick or a bite from a horse can be fatal, regardless of the label that we choose to put on them. Furthermore, there is nothing remarkable about the children from The Stables riding horses to and around the Phoenix Park. They are only carrying on a tradition that has been going on for at least the last thousand years and I fervently hope, will be going on for the next thousand years.

Thank you for taking the time to listen to or read my response.

Signed: 

Christopher Reid.

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Signed: 

Christopher Reid.



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