



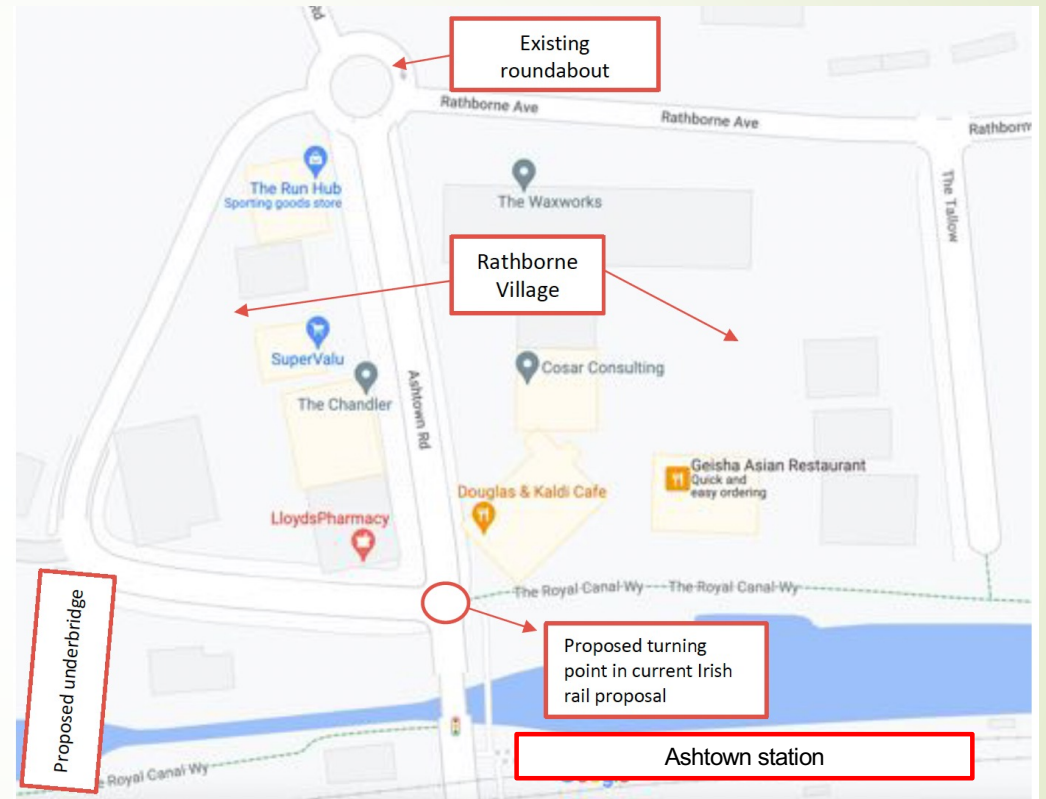
Rathborne Village Residents Committee

DART+ West Oral Hearing (ABP-314232-22)

Sep-Oct 2023

About Rathborne Village

- Rathborne Village is a mixed use development with 257 apartments and 16 retail units/businesses, which is home to about 600 people. It is situated parallel to the railway line and Ashtown station and overlooking the Royal Canal.
- Over 20% of households have children, almost 60% of which have their youngest child under the age of 10. Over a fifth of households have no car and 40% of residents use public/shared transport or active modes of travel to work, school or college.



Overall position

- Very supportive of upgrades to the railway line and service, as well as the move away from primarily diesel locomotive.
- However, believe that the implementation of DART+ West needs to balance the implementation of the infrastructural elements with greater consideration of the impact on the communities and biodiversity along the route.
- Following Irish Rail's responses our key concerns remain:
 - Integration of the proposed design into the local area
 - Environmental impact
 - Impact on human health of additional construction activity in adjacent lands at the time of DART+ West construction

Integration of the proposed design into the local area (1 of 3)

Aspect	Our submission	Irish Rail response	Our further response
Railway bridge	We propose that any approval of the railway order application is subject to the condition that Irish Rail budget for and consider approaches to soften the appearance of the bridge at Ashtown (and potentially other locations) and engage with the local community at the design phase.	During detailed development aesthetic refinement can be carried out to soften the appearance of the bridge.	We still believe it would be helpful to have meaningful engagement with the community at the design (and where relevant construction) phase as a condition to ensure these engagements it occurs.
Change of use of Rathborne Village	We propose that any approval of the railway order application is subject to the condition that Irish Rail make allowance for a change of use in the area of Rathborne Village and proactively engage with Rathborne Village Owners Management Company Limited by Guarantee, Castlethorn Construction and Dublin City Council in order to agree on the appropriate use of Ashtown Road once the level crossing is closed and appropriate enhancements to the public realm, reflecting the change of use.	IE to continue engagement with affected stakeholders during detailed design and construction stage of the DART+ West project.	

Integration of the proposed design into the local area (2 of 3)

Aspect	Our submission	Irish Rail response	Our further response
Palisade fencing at the location of the current the level on Ashtown Road	We propose that any approval of the railway order application is subject to the condition that Irish Rail consider and budget for appropriate fencing or coverage of palisade fencing where it is located in more sensitive areas, such as at the location of the current level crossing adjacent to Longford bridge and engage with the local community in arriving at solutions that complement the existing public realm.	A palisade fence is proposed on the closure of the level crossings to secure the railway against trespass and vandalism. The palisade fence is included in Irish Rail standards and provides the required security level in this location. Furthermore, this option allows for the installation of a gate to the track. Other IÉ standard fences do not offer the same track access and in this specific location, it is required for the purposes of railway maintenance access. The palisade fence has been used in other situations along the rail line, for example, in the closure of Hamilton View, east of Pelletstown Station, adjacent to Reilly's Bridge (the Royal Canal lock 8th)	The location of the palisade fencing mentioned, adjacent to Reilly's Bridge is a good example of why we do not believe it is suitable for a focal point (the station) within an urban village. We would encourage that other alternatives are explored in liaison with the local community, that meet the security and access criteria of Irish Rail while also managing the visual impact for Rathborne Village.

6

Integration of the proposed design into the local area (3 of 3)

Palisade fencing adjacent to Reilly's Bridge *(Google streetview)*



Rathborne Village Residents - ABP-314232-22

Environmental impact – Loss of trees and vegetation(1 of 3)

Our submission

As a result of our concern over significant tree loss and the associate eco-system and well-being services they provide:

We propose that any approval of the railway order application is subject to the condition that Irish Rail (1) conduct an Arboricultural Impact Assessment and share it with An Bord Pleanála and the public prior to approval to proceed with DART+ West works; and (2) evaluate how the level of tree and vegetation loss can be minimised from the DART+ West project compared to current proposals.

Irish Rail response

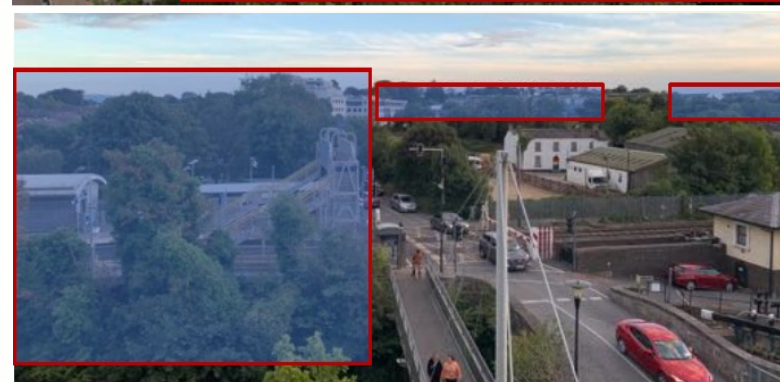
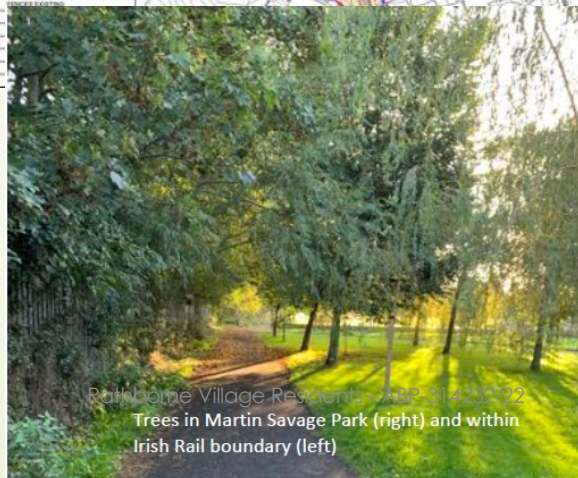
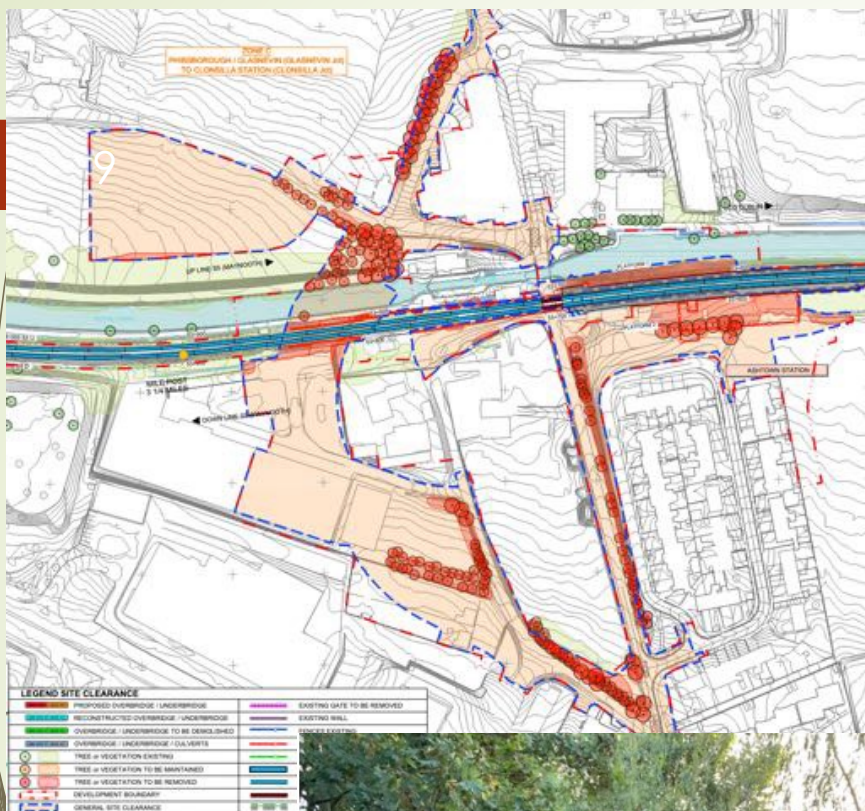
“Vegetation will be retained where practicable”

The loss of habitat to facilitate construction at Ashtown is described in Vol. 2 Chapter 8 Biodiversity, Section 8.8.2.1, which states that “An underbridge is proposed at Ashtown which will **result in the loss of one hectare of agricultural and built land and approximately 400 m of treelines/ hedgerows.** ...

The loss of trees and hedgerows is acknowledged in the EIAR. Section 15.5.1.1.3 States “**The sensitivity of the streetscape / townscape in this local area of Ashtown is ‘high’. The magnitude of change will be ‘very high’ and the likely effects in the construction phase will be very significant, negative, short-term.**” Replacement planting will be provided to mitigate the loss of this vegetation.

Environmental impact – Loss of trees and vegetation – our further response (2 of 3)

- On May 9th, 2019, Dáil Éireann declared a climate and a biodiversity emergency and evidence of the scale of biodiversity is emerging with increasing frequency.
- In this context, every effort needs to be made to minimize the removal of mature trees and vegetation as these support a large range of insect and wild life, which in turn supports the rich diversity of animal and birds along the Royal Canal (and the nearby Tolka river) as evidenced in part in the EIAR. Looking at the DART+ West project through a lens of minimizing the risk to biodiversity would inevitably lead to alternative design/construction decisions that would be less harmful.
- A UK government funded report released last December attempted to highlight the value of trees in terms of carbon sequestration and other eco-system services such as removal of air pollution. It did not capture other features such as the wellbeing benefits of trees. It put a value of about £1,800/€2,000 per year for each hectare of non-woodland (urban) trees, with some larger trees having a potential value of around £100,000/€116,000.
- To avoid the potential introduction of non-native invasive species, such as the Oak processionary moth, any replacement trees should be sourced from reputable domestic suppliers.
- Similarly, **we reiterate our request in our initial submission that Irish Rail (1) conduct an Arboricultural Impact Assessment and share it with An Bord Pleanála and the public prior to approval to proceed with DART+ West works; and (2) evaluate how the level of tree and vegetation loss can be minimised from the DART+ West project compared to current proposals.**



Environmental impact – Loss of trees and vegetation – bike parking (1 of 2)

Our submission	Irish Rail response	Our further response
We propose that any approval of the railway order application is subject to the condition that Irish Rail (1) re-assess the distribution of bicycle parking north and south of the canal and railway at Ashtown, making changes as relevant; (2) re-assess the area being taken for bicycle parking at Ashtown compared to the area determined by its own assessment; and (3) minimize the extent of removal of vegetation and oak trees located in the proposed bicycle parking location north of the canal.	37 bicycle parking spaces are needed at Ashtown Station. Bicycle's spaces provision is calculated based in the National Cycle Manual Section 5.5.7 "How much parking – Cycle parking Guidance", which states a guidance of minimum number of spaces that should be provided initially at new private and public facilities in urban areas. It has been considered that a space of 61 m ² is sufficient to include the required 37 bicycle parking spaces.	We do not believe that the issue raised in our submission has been appropriately addressed. 230m ² is being allocated to the north of the canal (area mentioned above) with a further 70m ² at the south of the railway. It is not clear why the areas each side of the canal are so unevenly distributed, or why such a large area is needed relative to Irish Rail's own analysis. Greater dispersion of bicycle parking between both sides of the railway could minimize the impact on vegetation and trees north of the canal.

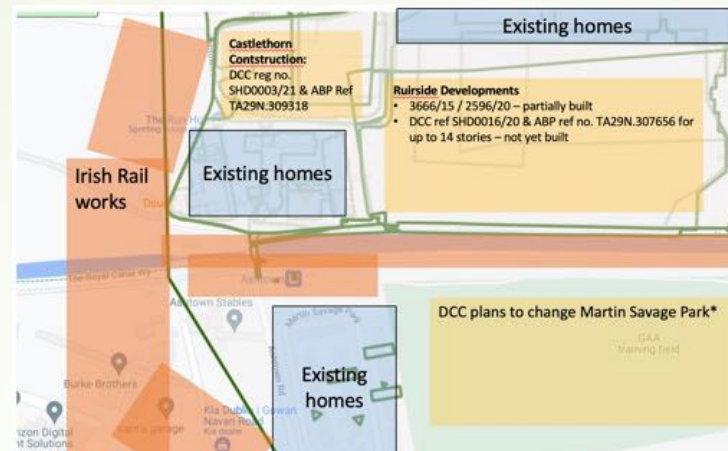


Cumulative construction impacts (1 of 3)

Our submission	Irish Rail response (excerpt)
<p>We propose that any approval of the railway order application is subject to the condition that Irish Rail engage with Castlethorn construction and, if necessary, Dublin City Council, where there is contemporaneous development of sites surrounding Rathborne Village and DART+ West construction to: (1) assist in the application of similar mitigating actions in terms of dust and pollution for residents of the area; and (2) coordinate activities to minimize the impact on the area.</p>	<p>The cumulative effects arising from the proposed development with other existing and/or approved plans and projects during the construction and operational phases of DART+ West project can be found in Chapter 26 Cumulatives. Table 26-6 Tier 3 Projects within the functional area of Dublin City Council, of Section 26.3.1.2 has included the Planning Applications of Ruirside Developments (EIA Portal ID 2020109, DCC reg no. SHD0016/20 & ABP ref no. TA29N.307656) and Castlethorn Construction Unlimited (DCC reg no. SHD0003/21 & ABP Ref TA29N.309318). The EIAR for Ruirside Developments (Stephen Little & Associates, 2020) indicates that the construction phase will be in two phases, with the first phase commencing 2021 and completing in 2023, and the second phase commencing in 2023 and competing in 2026. The construction programme indicated for the Castlethorn Construction Unlimited development is indicated to commence in the second half of 2021, with a 30 month programme. <u>Therefore, there is only a likely overlap of construction phases with the DART+ project (with construction anticipated to commence in 2024) and the Ruirside Developments.</u></p>

Cumulative construction impacts – our further response (2 of 3)

- It is clear, based on current activity that the expected timing of construction of the two sites adjacent to Rathborne Village now differs significantly from those set out in Irish Rail's response.
- Therefore, the possibility of multiple construction sites being in operation at the same time remains high.
- Our experience is that developers have not in the past taken the levels of mitigation proposed by Irish Rail for DART+ West in order to minimize dust and particulate matter arising from construction. We have experienced significant levels of dust in recent years, from building that is further away than the two sites in question.
- There is increasing evidence of the significant detrimental health impacts of exposure to particulate matter (in particular PM 2.5) for humans, especially for children. This would be exacerbated by the removal of trees to absorb some of this air pollution.
- Similarly noise levels are known to cause stress to both humans and wildlife.
- **Given there is potential for 3 building sites to be in action at the same time and that there are 100+ children living in Rathborne Village, it is imperative that appropriate mitigating actions are coordinated between Irish Rail and the developers of both sites in the event that construction activity overlaps. We would like such action to be embedded as a condition in the plan, alongside the involvement of Dublin City Council.**



<https://www.maps.ie/draw-radius-circle-map/> - radius 150m

Rathborne Village Residents - ABP-314232-22