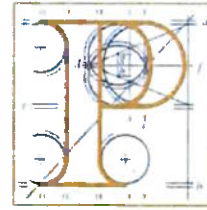


**Our Case Number:** ABP-314232-22



An  
Bord  
Pleanála

Christopher Reid  
Ashtown Stables  
Pelletstown House  
Ashtown  
Co. Dublin  
D15 HFX5

**Date:** 07 December 2023

**Re:** DART+ West Railway Order - Dublin City to Maynooth and M3 Parkway  
County Dublin, County Meath, County Kildare

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed railway order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie). Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

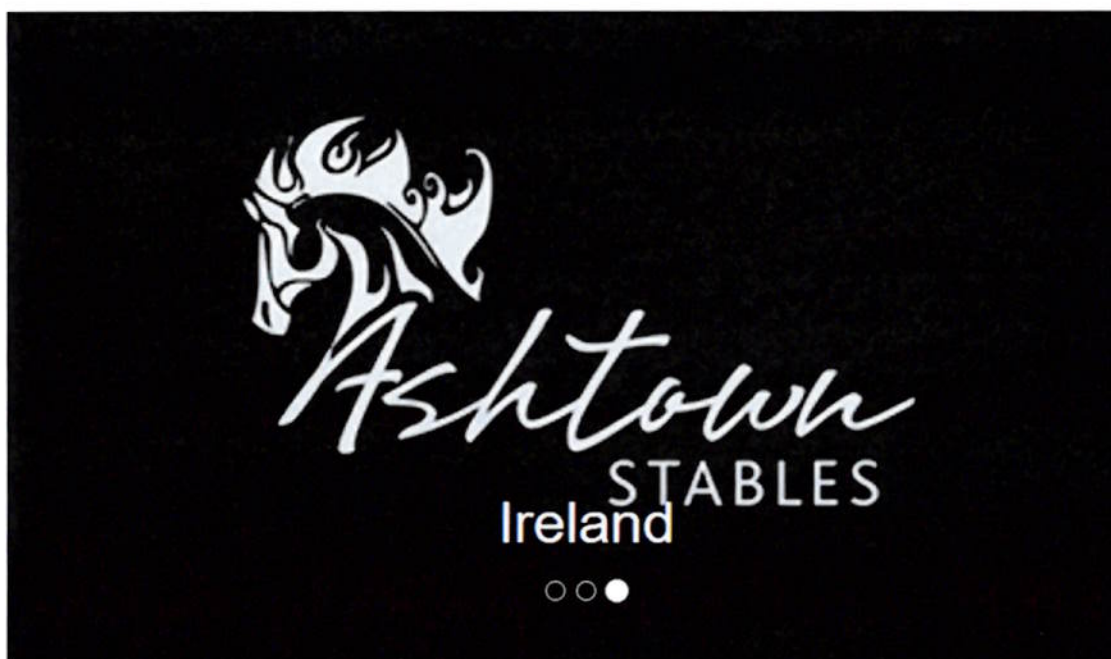
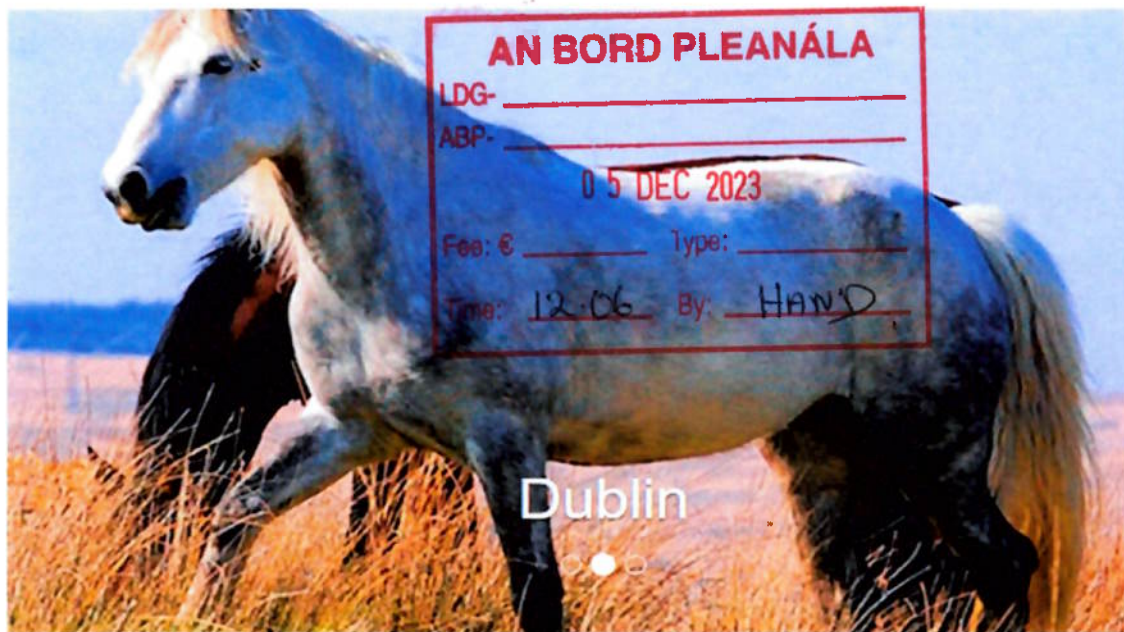
Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

RA05

|                           |                |  |
|---------------------------|----------------|--|
| <b>Tel</b>                | <b>Tel</b>     | (01) 858 8100  |
| <b>Glaó Áitiúil</b>       | <b>LoCall</b>  | 1800 275 175   |
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| <b>Láithreán Gréasáin</b> | <b>Website</b> | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| <b>Riomhphost</b>         | <b>Email</b>   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

|   |   |
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|---|---|





**Document present to An Bord Pleanála  
The Stables, Ashtown, Dublin 15.**



## **Table of Contents**

**For clarity**, the following document is divided into two parts. **Part One** is the response that was presented by Christopher Reid to the oral hearing that began 29/09/2023, if you are familiar with **Part One** and are only concerned with the latest response, you can go directly to **Part Two** on Page 21.

**Part Two** is the response to the letter dated 23/10/2023 to Christopher Reid from An Bord Pleanála: seeking an additional response to **Part One**.

**Part One** is included for the reader that did not attend the oral hearing on the day that the document was read into the record of the hearing. It is included for those that are not familiar with The Stables' objection to the proposed project.

### **Part One**

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## **Part One**

### **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.*

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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.

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, they feel that if one of the level crossings interferes with their proposed project they then assume 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 the 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 Ashtown 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 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.

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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



The above extract from IR'S 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)***

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 grevel 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 IÉ 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 Iarnród 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 it 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.

**The above fifteen pages were read into the records of the oral hearing and printed copies handed to the inspector.**



## Document for Oral Hearing 04/10/2023

Presented by Christopher Reid

Good morning. I would like to thank The Inspector, despite the late hour, for allowing me to speak yesterday evening. I would also like to thank him for inviting me to attend this hearing again today. I know that you have a busy schedule so I will be as brief as I can.

To a degree I can understand Irish Rails' position. They see The Stables as a piece of development land. They struggle to get their heads around the fact that it is anything but a piece of development land, that is just sitting there, waiting for the highest bidder to come along. The bidders have come along and when it was explained to them the rationale as to why The Stables could not be transplanted to a different location, they put their cheque books back in their pockets and moved on.

Irish Rail have over a dozen other options that they can choose from. The Stables has no other option. Is The Stables to be penalised for making the decision to continue providing a unique public service, despite the lure of what can only be described as ridiculous amounts of money. Listening to all of the experts that Irish Rails lined up yesterday dividing up The Stables is hard to take. I am reminded of all the experts that lined up to tell the bumblebee that according to the laws of aerodynamics he has no right to fly. Those experts are probably tempted to argue like Irish Rails experts are attempting to argue: that if we cut off one of the bumblebees' wings he will not be able to fly, and our theory will be right.

I will elaborate on the above analogy by reference to what Irish Rail's experts have stated. They have told us that according to their **desktop studies** there is no reason as to why The Stables cannot operate in the middle of a building site. I would like to put **my boots on the ground** study into the mix. Engineering is also my background. My mother in her wisdom told me that I would never make a living from horses and that I needed a good education and a proper job and that when I had both of these I could always return to horses. I took her advice and gave the same advice to all of my children and I give the same advice to all the children that ride at The Stables. Fortunately for The Stables, my children heeded the advice that was handed down to me. Which brings us back to building sites. Before I set up my own engineering business I worked on a lot of the major sites and did work for most of the major projects that were carried out in Ireland during the sixties, seventies, eighties and nineties. With my knowledge of horses and my understanding of how building sites operate I am well placed to say without fear of contradiction that it would be impossible to operate a riding stable in the middle of a building site. And no amount of **putting appropriate measures in place** will change the hustle and bustle that goes on, on a busy construction site.

At the first webinar that we attended we were told that The Stables was going to be compulsory purchased. We were also told that one of the reasons was that some of Irish Rail's other options were ruled out because the land was owned by developers and would be too expensive to purchase. I formed the opinion after listening to Irish Rail at the webinars that they saw The Stables as the **path of least resistance** and set about designating it as their preferred option. My worst fears were confirmed when our neighbour showed me Irish Rail's mock-up of their plan for The Stables: We had been completely demolished. Despite their plethora of experts there was no mention of that blunder in Irish Rails response yesterday. How could any rational person trust Irish Rail after inadvertently showing their hand.

At yesterday's hearing they inadvertently showed their hand again. The meeting was treated to Irish Rail dismembering The Stables. Cutting parts off and adding parts on. It was reminiscent of the **sliver** of cheese that I described yesterday. The Stables is much more than the sum of its parts. With the arrogance that Irish Rail displayed yesterday and throughout my dealings with them, they felt that demolishing The Stables was a shoo in. I have to admit that it does bug me when I see the contempt that they have for The Stables.

I am continually treated to Irish Rails mantra that I will not engage with them. As I pointed out yesterday: my assisting them to render The Stabled inoperable would be like assisting a burglar to ransack your house. I see The Stables as a local amenity, something to cherish not as an impediment to Irish Rails attempt to bring the railway system into the twenty first century. At yesterday's hearing Irish Rail made comparisons with the railway in the UK and Europe. It pains me to say it but there is no comparison. Despite my difference of opinion with Irish Rail I hope their effort to upgrade the railway and turn it into a viable business succeeds and The Stables are left intact for future generations to enjoy their chosen sport to the backdrop of passing trains.

Signed: \_\_\_\_\_  
Christopher Reid.

**Pages 17 and 18 were also read into the records of the oral hearing and printed copies handed to the inspector.**

Due to time constraints, the two pages below, were not read into the oral hearing records. However, with CIE/IR attempting to proffer additional information at this late stage, in a vain attempt to bolster the weak case, I would like to enter the following narrative into the records of the oral hearing.

### **Summary Document for Oral Hearing 11/10/2023**

#### **Presented by Christopher Reid**

Good morning Mr. Inspector, thank you for allowing me to make this short summary. It has been a long and drawn out journey and hopefully when it is finished we will be able to go about our business without further distractions and the energy and resources that we have built up, to stay the course, can be diverted and put to better use. We were invited to this hearing because as landowners we may be affected by Irish Rail's proposed project. Over the course of the last two years with our robust detailed objections and with the frank exchange of views at this hearing, Irish Rail should be in no doubt that the term "**landowner**" is no longer appropriate. Irish Rail's initial attempt to condense what we are about into "**landowner**" is disingenuous. The Stables is part of the community. It has morphed over a long period of time into one of the best amenities in the city. Forcing The Stables to close would prevent children and women from participating in an outdoor sporting activity. The only reason that I am here today, is to hammer home the point that The Stables needs to be left intact for future generations.

It was interesting to see yesterday that we were not the only people at this hearing to question Irish Rail's interpretation of water levels. The entrance at The Gate Lodge at Ashton House summarises my concern as to where the rainwater from the tunnel will go. The conversation between Castlethorn and Chartered Land Group and Irish Rail inadvertently revealed that if the proposed project goes ahead there will be a drop of 2.7 metres in the level of the existing road at the Gate Lodge alone. I estimate that it could be twice that figure. It would also mean that the gates that are supposed to be preserved would now be a minimum of nine feet below the existing ground level. And as a matter of interest for Irish Rail's attention, it is not Dublin City Council that looks after the rain water in Mill Lane, it is part of Fingal County Council's remit, who have told me on numerous occasions, that they have not the slightest idea where the water drains to. As I have already told Irish Rail they need to have a word with Conor: Fingal County Council's retired engineer.

Throughout this hearing Irish Rail continued to tell us that the councils that are affected by the proposed project are onboard and are in general agreement. From where I am standing, if what they say is true, it begs the question: if these councils are genuinely committed, why are they not at this forum answering awkward questions and allaying the genuine fears that those impacted by the proposed



project will have? As things stand we only have Irish Rail's words to go on. And that leads us onto another question: Do the council officials that Irish Rail were speaking to have the authority to commit their respective councils to spending an unspecified amount of money?

Mr. Inspector I will wind up my summary by stating the obvious: Irish Rail need to realise that they are not the only inhabitants on this island. We are no longer an island of semi-literates ruled by an elite. We are now, I am delighted to say, a nation of highly articulate and well-educated people. Some segments of Irish Rail's proposed project have hit a roadblock and need to be dealt with in a reasonable and rational manner. Yesterday, Irish Rail highlighted three of their stations on the southside. Today, I would like to highlight one of their stations, also on the southside: Lansdowne Road. It has an electronic barrier that works quite well, despite the challenges that it constantly faces. A modern version of this barrier would be well suited to Ashtown where there is not a fraction of the traffic, or people passing through.

Signed: \_\_\_\_\_

Christopher Reid.

**The above two pages, due to the reasons stated above, were not read into the records of the oral hearing and copies were not handed to the inspector.**

## Part Two

### **Response to the letter dated: 23/10/2023 from An Bord Pleanála.**

Dear Mr. Moore,

Thank you for informing me that CIE/IR have decided at this late stage to add another desk study to the mix. With winter setting in and the days getting shorter, we are focused on making sure that we have enough fodder to see the horses through the winter and early spring and time is now at a premium. However, I will take time out to respond to what CIE/IR have to say. I will have to be as brief as possible, for the reasons mentioned above. However, should you need clarification on any part of the narrative below, please do not hesitate to contact me.

From day one, Mr Moore CIE/IR have endeavoured to denigrate The Stables and in their Updated Statement they continue in the same vein and I quote from their revised document: ***'poor quality inland feeding'***. What gives CIE/IR or any semi state body, the right to insult land that does not belong to them? Were they not satisfied with denigrating our horses at a public hearing and categorised them as docile and biddable? No private enterprise should have to suffer insults from a state or semi state body. Has it finally sunk in that they have lost the battle to confiscate The Stables and are now clutching at straws? Why are they honing in on our Brent Geese and finding fault with the type of feeding that we provide them with? The Updated Statement is riddled with inaccuracies. I am reluctantly forced to take more time out than what I originally envisaged and respond to their inaccuracies. CIE/IR attempt to boil this dispute down to what they describe as a *loss of 3%* will not wash. That 3% is actually 14% and that 14% weaves its way throughout the very fabric and wellbeing of The Stables, the horses and foals. The 3% figure is nonsense and is an attempt to take the spotlight of the proposed demolition of The Stables. I have taken a lot of valuable time with the narrative below and it will clearly show the figure of 3% that CIE/IR have allocated to the Brent Geese, is only a red herring. I will also set out below why the ***'sliver of land'*** (CIE/IR WORDS) in question is so important to the wellbeing and safety of the horses, the children and adults that ride them.

You will also recall Mr Moore that CIE/IR did not provide an expert on Brent Geese that could be questioned at the oral hearing, instead they relied on hearsay evidence. The experts that CIE/IR did provide were found wanting at the oral hearing. You will recall Mr Moore asking their noise expert, two or three times, if anyone could live in Mr Malone's house while construction was taking place: he avoided answering your question. He may very well be an expert at his desk, but as I pointed out to him, at the oral hearing, he had absolutely no idea of what goes on on a building site. You will also recall CIE/IR'S equestrian expert passing judgement on

The Stables despite the fact that he has never operated a riding stable or taught children or adults to ride. He informed the oral hearing that his expertise, (which after his contribution at the oral hearing, is open to question,) was with thoroughbreds. There is no comparison between The Stables and a racing yard. Racing horses are trained to go as fast as they can, with the aid of a whip, if need be, over a given distance.

At The Stables our clients do not use whips on our horses. The children are taught to ride and control their horse without the use of violence. Horse riding is an art. It is like dancing or music, you would not teach a child to dance, sing or play an instrument with the aid of a whip. Horse riding at The Stables is about bonding with your horse, thrusting and looking after each other. By the careful selection and breeding of horses over the last forty years we have produced a unique school of intelligent horses. They are trained from the day they are born to interact with people, particular children. It takes at the very least seven to eight years to bring an Ashtown Stable horse to the required high standard. Without our world renowned school of horses it would be impossible to operate a riding stable in a major European city. None of our horses are biddable and docile, the description that CIE/IR expert was so quick to assign to them. The horses at The Stables trust the staff and their environment. The Stables are enclosed by hedgerows and as Mr Killcullen pointed out at the oral hearing, he did not know that The Stables were there. If he did not know that there were horses in Ashtown, it follows that he did not know about our geese. Why are CIE/IR now relying on hearsay in a vain attempt to denigrate our Brent Geese. The 14% where the geese feed, is the perfect environment for training riding school horses and teaching them to trust and bond. If you put your horse in danger and he suffers from your ignorance, you lose the horse's trust and once lost, will never be regained and if you allow it to happen, the horse will never again perform satisfactorily. Removing the hedgerows that encompass The Stables will be to the detriment of the Brent Geese and riding school horses. Removing the banks and the hedgerows will increase CIE/IR land grab from their fictional 3% to almost 19% and leave The Stables exposed to the elements. That is without considering the detrimental effects of putting the remainder of The Stables into the eye of a building site.

The hydrology expert's theory of his '**once thousand flood year event**' did not take long to unfold. As I write this narrative the Tolka Food Plain has burst and the River Road is now flooded and closed for the foreseeable future. It was inadvertently revealed at the oral hearing that Ashtown Road (outside Ashton Lodge) will be lowered by nine feet, something that CIE/IR have constantly denied that they would have to do. We were told at the webinar and again at the oral hearing that their experts could make water flow uphill. Again I would like to know how their experts will deal with the Tolka Floodplain now that **mother nature** does not seem to have been made aware of their '**once in a thousand year event**' theory. I will repeat myself again and ask the simple question: why can't the hydrology expert using a

fixed local level point, as detailed on page 10, and from this fixed point, give a reading from the finished floor level of the tunnel, a reading from the finished road at the Ashton Lodge and a reading where the Ashtown Road meets the River Road and a reading from the finished floor in car park opposite The Gate Lodge. There is no point whatsoever in using sea levels.<sup>3</sup> It is essential that local levels are used. They can then be cross referenced and this will allow people to make up their own mind and in the event of a problem at a later stage, it will also allow the people that signed off on the project to be held accountable. In layman's language what CIE/IR are proposing is to remove the railway embankment and allow the rainwater on the southside of it, to flow under the proposed tunnel and canal and flow uphill into The Tolka Flood Plane. I have explained on page 12 how and where levels can be taken, it is a very simple procedure to carry out. Why did CIE/IR not do it and produce the figures, for all to examine? Mr Moore throughout the Oral Hearing CIE/IR mentioned railway banks when it suited them. They did not mention that the sand arena also forms a railway bank and bursting the mill ponds will flood the arena and stables and will bring their alleged 3% land grab up 75%. The Stables, as I have already pointed out, are two metres below the railway. When the railway was being built, measures were put in place to prevent all the land and buildings south of it from being flooded, interfering with this system will have a detrimental effect on The Stables.

The proposed project that CIE/IR continue to persist with is wholly aspirational and not in the least, based on reality. CIE/IR have plucked the year 2040 out of the air and have convinced themselves and are trying to convince the Minister that with their billion plus euro budget, they will bring their moribund railway back to life, but CIE/IR have not convinced the minister. It is telling that the minister involved did not make himself available to answer questions about the proposed project, over the last three years. Nor did he bother to attend the oral hearing to make the case for the proposed project and address the genuine concerns of the electorate. With elections looming he appears to be putting distance between himself and the proposed project. Which, in its present bulldozer like approach, is doomed to fail. As I pointed out to CIE/IR at the oral hearing, when they in their innocence tried to compare their rail system with the rail system in the UK and Europe. I have travelled on both of these rail systems and the service that CIE/IR provide has nothing in common with either of the systems that they mentioned. Mr. Moore I do not have the time at present to go into greater detail on that aspect of the above topic. Suffice to say, if you do require additional information, I will find the time and be only too happy to provide the information.

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<sup>3</sup> Turloughs, which Ireland has an abundance of, are a perfect example as to why sea levels cannot be relied upon, to predict inland flooding.

Ireland as a nation has never taken to using the railway in any great numbers as a way of commuting. The reasons may be in part historical: Some of the founding fathers of our country wanted to rip up all the railway lines and did in part succeed in ripping some of them out. Harcourt Street being a case in point. The lines that were not ripped out were starved of the financial resources and the innovative management required to develop and expand them. Ireland owes its railways to William Dargan<sup>4</sup>, the best engineer<sup>5</sup> that the country ever produced. As well as building the railways in this country he also built the A5: a road that stretched from Hollyhead to London. It was argued by some of our founding fathers, that with a direct road from London, leaving the railway intact left the country vulnerable and open to being reoccupied.<sup>6</sup> This may have been one of the reasons, along with a depleted population<sup>7</sup> and high emigration, why the railway system in Ireland was never properly developed and never flourished. Historically Irish people never took to using the train on a regular basis and it is a tradition that has persisted to the present day.

Mr Moore I don't use the word moribund lightly, but use it I must. The railway has shrunk from 3400 miles throughout the island to less than half that. The railway line from Maynooth to Spencer dock is inflexible. It serves a set number of stations and cannot veer off of its defined route and go to where the commuters are. Prospective commuters in any great numbers do not feel that it is worth their time to make their way to the various stations. The Luas on the other hand is flexible, it weaves its way in and out through communities. It goes to where the commuters are now, not where they might be in twenty years time. The Dart system, which uses the existing railway lines, winds along one of the most picturesque coastline in Europe, attracts tourists, and serves the local population in a limited way. It may be the model and the only way forward for some of the existing railway lines that have become a constant drain on the exchequer. The Spencer Dock to Maynooth proposed project has none of the attributes of The Luas or The Dart. There is no rhyme or reason to what CIE/IR are attempting to do and awkward questions need to be asked: will throwing good money after bad change anything on the Maynooth to Spencer Dock line? Will demolishing The Stables and severing a community add anything of value to the Maynooth Spencer Dock line? As I write this narrative the current news reminds me of the piece that I wrote on page 3 about the need to bring communities together and not separating them. It is important that children grow together and learn from an

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<sup>4</sup> There is a museum dedicated to him in Belfast. His statue looks out over Merrion Square.

<sup>5</sup> The engineers that gave us our power stations and assisted with the electrification of the country were all from Germany. All the drawings that they provided for ESB in the sixties, used the metric, almost ten years before it was introduced into Ireland, when we joined the EEC.

<sup>6</sup> To be fair to them, they may not have been too far off the mark. An english politician in his history of the second world, stated that he would have had no compunction in reoccupying Ireland if he felt that need arose.

<sup>7</sup> Ireland's population is lower now than it was one hundred and seventy years ago, one of the few countries in the world that can lay claim to such a revealing statistic.

early age to mingle effortlessly with each other. Severing a community with so many diverse cultures is not the way to go about doing that.

As a nation we like looking at trains and enjoy the sound that they make. Like horses, they provide a beautiful backdrop to any setting, they remind us of how things used to be. If you exclude the busy mail boat train to Dun Laoghaire used by people as they left the country in their droves, during the fifties and sixties, other than that, there never was any great desire by Irish people to use trains. With the benefit of hindsight the era above was the highlight of the relationship between Irish people and the train. I have free travel, live beside a train station and I never use the train and I don't know anybody that does. On the other hand, Irish people have embraced the aeroplane. They have taken to air travel, like a duck to water. Over the last October Bank Holiday Weekend alone, there were almost half a million flights to and from Dublin Airport. Despite blanket advertising, widespread free travel and minimum fares for young people, the present generation and indeed, the generation following it, have shown little or no desire to use the train, in any meaningful or commercially viable way.

Mr. Moore, I would say to CIE/IR by all means modernise the rail network, but do it in a way that causes as little disruption as possible. Trying to revisit the Brent Geese and looking to close one of the blatant loopholes in their proposed project is not the way forward. I took time on page 15 in the narrative above on the Brent Geese, that I read into the records at the oral hearing, to explain how plants and animals survive and prosper by the use of symbiosis. I also took time out to explain how Ireland changed direction at the beginning of the sixties and how CIE/IR were left behind. In the piece above I mentioned Dublin Airport, they availed of the opportunity that was presented to them and prospered. CIE/IR could and should have formed a symbiotic relationship with Dublin Airport and the other semi state bodies that were set up, in an effort to drive the country forward. They could have put the infrastructure in place to service the airport, but no, and it pains me to say it, they sat on their hands and missed a once in a lifetime opportunity, to generate income that would have enabled them to invest in their network, expand and in turn generate more income. Dublin Airport has gone from strength to strength and has been so successful in generating business, that a cap of 32 million passengers has now been placed on it. CIE/IR should have, working with other state and semi state bodies, played a major part in developing the infrastructure in Ireland. They need only look at what Ryanair has done for our small country. Without any help from the exchequer. Ryanair is now the leading airline in Europe. Because of CIE/IR'S inaction, Dublin Airport is now the only major modern European City that does not have a rail connection. There are many other examples like those above, throughout the country, where CIE/IR sat on their hands and made no attempt to assist in building a modern country. On the contrary, as I have detailed below on page 26 below, they wilfully impeded those that tried to establish business in the transport or public services industry.

While I am in North County Dublin I will remind CIE/IR how important it is to listen to what the general public have to say and not to attempt to steer their own course, without a reliable map. I will take CIE/IR back to 21/08/2009 and remind them of the time, when two spans of the viaduct collapsed into the estuary, thankfully without the loss of life. They were told by numerous members of the public that the structure had major cracks. They ignored the warnings and when the viaduct collapsed they immediately went into denial and tried to wash their hands of the whole affair. Nobody stepped forward to take responsibility, face the media or answer awkward questions. Now they want to enter into the unknown, go excavating and build an unnecessary tunnel and delve into two millponds that have lain dormant for over a century and have become home to the otter, the feeding grounds of numerous species of bats and a host of other wildlife, when a simple electronic barrier would suffice. It is important that this time around they heed the warning, otherwise they will foist devastation and destruction on a settled neighbourhood and in the process destroy a community and one of Europe's leading riding stables and with it a wealth of knowledge and expertise that can never be replaced.

It was never my intention to heap criticism on CIE/IR or remind them of their past, but they have left me with no option. I have lived beside the railway for most of my life and I have lived cheek by jowl with them for the last forty years. Mr. Moore I can tell you without fear of contradiction that they are the ultimate neighbours from hell. CIE has a history of attempting to stifle the micro economy: They used their powers of monopoly to stamp out any opposition to their freight and bus business. The people that stood up to CIE and attempted to set up and operate any of these businesses were given a choice: jail or emigrate. In Ireland at the time, jobs were few and far between and if you did not have one, you had to immigrate. I grew up during this era and witnessed first hand, truck and van owners being intimidated, when their only crime was to try and earn a living and raise a family. Mr Moore my generation was brought up to suffer in silence or emigrate. Any discomfort that came our way, we were told to offer it up for our sins. I would no doubt have continued to suffer in silence but, CIE/IR overstepped the mark when they tried to confiscate The Stables.

Mr Moore I am aware that brevity is the soul of wit, however lack of time forced me to depart from that maxim. I did not have the time at my disposal to make the above narrative any briefer. Due to time constraints, I also had to omit a lot of important points that are relevant to CIE/IR'S additional response. I am now forced reluctantly, due to a lack of time, to conclude my response with the following pages:

Mr Moore I do not see The Stables as belonging to me, at my age, how could I. I see it as belonging to the generations that have yet to be born. I see it as part of the tradition of this great country of ours. Where else in this great city are its children to learn about horses and understand the part that they played in our past? Horses like dancing, music, poetry and literature are synonymous with Ireland. The proposed destruction of The Stable would be an act of wilful vandalism that no minister in Dail



Eireann, when made aware of it, would be prepared to stand over or sanction. Unlike the generation before me I will not be bullied or intimidated by CIE/IR and thankfully have the intellect, the resilience and the resources to take them on at their own game. I have told all the builders and developers that were interested in the site, that The Stables were sacrosanct and that it was my intention to pass our unique national tradition and heritage on to the next generation and hopefully The Stables would end up like The Phoenix Park: a permanent fixture in the community. To a man they all understood and looked elsewhere to develop and build.

The proposed project that CIE/IR have in mind is to electrify the Maynooth to Spencer Dock railway. There is nothing wrong with that. On paper it seems like a good idea. I was informed belatedly that as a landowner it may impact me. When my daughter managed to track down a copy of CIE/IR'S proposal it became obvious that paper never refused ink. It came as a shock to the system when I realised that CIE/IR had wiped The Stables off the map and they were going about their business as if we did not exist. The second shock to the system was when CIE/IR made a unilateral decision to dispense with a public consultation and decided to hold a webinar instead. The third shock to the system came when CIE/IR decided that they did not want to hear what the people attending the webinar had to say and turned off the microphones. The fourth shock to the system came when (on this occasion I could feel the sweat streaming from every pore in my body,) in the space that was occupied by The Stables CIE/IR management and their employees were busy dissecting The Stables on their white board and were busy putting their devious plans into action. The microphones were turned off and I had no right of reply and against my will I was forced to suffer in silence, but not for long. I had no intention of coming out with my hands up and immediately set about organising a robust defence of The Stables and all that they stand for. I have spent the last three years asking CIE/IR to cut their cloth to suit their measure and to refrain from taking clothes that do not belong to them. Irish Rail can produce as many glossy brochures as they like, but the reality is that as far as the Irish economy is concerned they only have a cameo role to play. If Irish Rail ceased trading tomorrow would they be missed? The answer has to be a resounding no. On the other hand if Dublin Airport, The Ferry Ports, IDA, Ryanair, the high tech industries, the pharmaceutical industries, the farmers of Ireland, the retail trade, the road network and the truckers and vans that us it, to mention just a few, were to even curtail their services tomorrow, the health and viability of our exposed economy would feel the chill.

I have laid out elsewhere why, as far as The Stables' are concerned, that the proposed project will not work, and I do not have the time to go over it again. The public good has been mentioned as one of the reasons why The Stables needs to be demolished. Another reason mentioned was to facilitate the population of Maynooth and another reason were the people working in the offices at Spencer Dock. I will take Spencer Dock first. Evidence was produced at the oral hearing to show that since the change in work practices brought about by the lockdown that there is a

surplus of office space at Spencer Dock. Developers are now converting offices into apartments, which in turn will reduce the need for additional trains either now, or in the future.

Maynooth is the town at the other end of the proposed project. It is also the end of the double rail line and the beginning of the single rail system that goes on to service the west. Maynooth has a population of 17259<sup>8</sup> and is considered a relatively small town. CIE/IR propose to improve the service and provide the town with a modern train service. The exchequer and the EU have given them the resources to fund the project and it is only right that they proceed as soon as possible. The railway may be moribund but that is no reason why it cannot be tweaked and the service improved for all of the commuters that use the railway line from Maynooth to Spencer Dock. There is no good reason why all of the above cannot be achieved without demolishing The Stables and severing the community. The Stables serve a population in excess of half a million people<sup>9</sup> and does not stand in the way of CIE/IR making the necessary improvements to the railway service. When it comes to discussion about the public good. The Stables is more than capable of holding its own.

Am I confident that The Stables will survive? Of course I am, we have rebuffed all of CIE/IR spurious arguments and claims to date. As I have clearly shown, the railway system in Ireland is moribund and demolishing a viable amenity like The Stables, in a facile effort to breathe life into it, cannot be justified, by any stretch of the imagination. CIE/IR missed the boat in the sixties and like Rip Van Winkle before them, wake up sixty years later and expect everything to be the same, but it isn't. Everything has changed and changed for the good. Motorways have taken over and Irish people, whether we like it or not, have fallen in love with their cars. You need only look at the intersection where the M50 meets the railway line on the N3 to realise that electric cars are the way forward and the county is gearing up to facilitate them. Ireland does not have the big cities and the large populations that would make intercity train journeys viable. Or we do not have a dictatorship that can manipulate the population, deprive them of the freedom to choose and force them to travel by train. There is a small niche market for trains in Ireland but that is all it will ever be. No amount of publicity, spin or endless sums of money will ever change that. The present sclerotic management that CIE/IR are lumbered with, have no place in today's world. The prerequisite for any major project is a forward looking leader with an innovative team that has the ability to adapt and is responsive to the challenges that will present themselves along the way.

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<sup>8</sup> CSO 2022

<sup>9</sup> CSO May 2023



Instead of CIE/IR trying to add more superfluous information into the mix, in their effort to demolish The Stables, they should be throwing in the towel. They do not have a leg to stand on, there is not a court in the land or a politician that would back them. At this stage they should be taking cognisance of the detailed feedback that they have received free of charge and proceed with a revised project. Threatening people with a Railway Order that they have not yet received will not work. Railway Orders cannot be used the way their employees use their slash hooks and chainsaws to keep briars from encroaching the railway. As I pointed out on page 23 the days of CIE/IR bullying people are over. They will not get everything that they wanted but they have enough latitude that will allow them to proceed. As for The Stables we did not get everything that we wanted, we will never be able to recover the three years that we spent defending our constitutional rights.

Mr Moore thank you for taking the time to read my response. Every cloud has a silver lining, this particular cloud had at least two. One was the support that The Stables generated from our present and former clients, the community, our overseas supporters and those people, because of the positions that they hold, I am unable to mention by name. The second silver lining was the politicians that supported The Stables. Their dedication to public service left nothing to be desired. Their generosity with their time and advice and their ability to be almost in two places at the same time, such is the demand from their constituents. Despite being underappreciated and overworked they never cease in their endeavour to treat every case that they deal with and give it the attention to detail that they feel it deserves. For all those that supported The Stables, I offer them my sincere thanks.

Signed: Christopher Reid

Christopher Reid.

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