

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



**An  
Bord  
Pleanála**

Navan Road Community Council C/O Patricia Dunleavy  
10 Glendhu Park  
Co. Dublin

**Date:** 08 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  
Senior Executive Officer  
Direct Line: 01-8737247

RA05

**Teil**  
**Glao Áitiúil**  
**Facs**  
**Láithreán Gréasáin**  
**Ríomhphost**

**Tel**  
**LoCall**  
**Fax**  
**Website**  
**Email**

(01) 858 8100  
1800 275 175  
(01) 872 2684  
[www.pleanala.ie](http://www.pleanala.ie)  
[bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

**Lauren Griffin**

---

**From:** Lauren Griffin  
**Sent:** Friday 8 December 2023 13:56  
**To:** [REDACTED]  
**Subject:** RE: ABP 314232-22 DART+Maynooth - Railway Order

A Chara,

We acknowledge receipt of your email; official acknowledgement will issue in due course.

Kind Regards,

Lauren Griffin

**From:** Pat Allison <[REDACTED]>  
**Sent:** Thursday, December 7, 2023 11:54 AM  
**To:** LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Cc:** [REDACTED]; Pat Allison  
**Subject:** ABP 314232-22 DART+Maynooth - Railway Order

NAVAN ROAD COMMUNITY COUNCIL

Dear Sir/Madam,

We enclose herewith. as attachment, our submission in relation to the further information 'Update to the Futura Impact Statement'.

Please acknowledge receipt, in due course.

NAVAN ROAD COMMUNITY COUNCIL.

cc our committee, for filing purposes.

**NAVAN ROAD COMMUNITY COUNCIL**

***Navan Road Community Council was formed in 1968 as an umbrella organisation to represent individuals, residents associations & other groups throughout Navan Road area, Dublin 7.***

**CHAIR;**

Patricia Dunleavy,  
10, Glendhu Park,  
Dublin 7.

**TRES;**

Colette Timmons,  
22, Park Road,  
Dublin, 7.

**TO;**

An Bord Pleanála,  
64, Marlborough Street,  
Dublin 1.

6<sup>th</sup> December, 2023.

RE; ABP -314232-22

DART + Maynooth Railway Order.

Dear Sir/Madam,

Thank you for insisting on opportunity for those who previously submitted, to re-submit on the very late Additional Information on likely impacts on Environment of the I. Rail proposals, currently with the Bord.

Our submission, is firstly, based on their NATURA REPORT, Section 3 - pg. 10;

- "A desk study was carried out to determine the inland feeding sites for Brent Goose. The inland feeding sites were identified from the results of the Dublin wide Brent Goose surveys undertaken during the seasons of 2015/16, 2016/17, 2018/19, 2019/20, 2020/21, 2021/22. The main source of data for these studies was provided by the Irish Brent Goose Research Group, which included verified records received from members of the public. The most recent survey examined 149 sites in Dublin City. Martin Savage Park is assessed as being of 'Major' Importance for brent geese, with a peak count of 650 birds recorded during the 2021/22 season."

We respectfully submit, this item confirms the importance of Brent Geese throughout our area, NOT ONLY 'occasionally' within Ashtown Stables area. Ashtown stables is an extremely important venue, used by many young people throughout our area, and from wider surrounding areas. We represent the human residents throughout our area; we now submit that this vital area in Martin Savage Park playing fields, adjacent to the Rail Line as identified in ' studies of 2015/16; 2016/17; 2018/19; 2019/20; 2020/21; and 2021/22' and confirmed by I. Rail Natura Report - exists between large residential areas of our own Navan Road district, an aging area, and the newer younger population in the new developments of Pelletstown - and is of great importance to the community, with its resident and visiting wild life, including the annual Brent Goose arrivals. The playing fields have an ancient hedgerow between them and the Rail line, forming part of the native wildlife habitat, as well as a Bat habitat.

- “ The Ashtown Stables has not been surveyed for Brent Goose to date, due to the features of this area which make it unsuitable as inland feeding habitat for Brent Goose. The site is approximately 50m x 150m, intersected by fences and surrounded by treelines on all but the north side, thereby not providing the security and visibility that is preferred by this species. The use of the Ashtown stables by Brent Goose was raised in a submission at non statutory public consultation. If, as the submission suggests, the site is used by Brent Goose, the site would, in the worst-case scenario, represent a poor-quality inland feeding site that is used occasionally by Brent Goose.”

1. We respectfully submit there is some misinformation in this section, (as occurred previously, throughout I. Rail application; i.e., ‘Ashtown House’ referred instead of ‘ASHTON HOUSE’ with pictures submitted to the Bord, misidentifying Ashton House, as being the long burnt out Ashtown House, among other misrepresented items ) ;

Ashtown Stables is in fact surrounded by ancient Hedgerows on all sides; the only ‘fences’, to best of our knowledge, are a short section, on both sides of short entrance area, inside entrance gates. These ancient Hedgerows are home to many local breeding and passing Birds. The stables and house are to West of the venue, the only area not surrounded by a Hedgerow. (another mistake in this late NATURA REPORT.)

- “If, as the submission suggests, the site is used by Brent Goose, the site would, in worst-case scenario, represent a poor-quality inland feeding site that is used occasionally by Brent Goose.”

2 We respectfully suggest that I. Rail Natura Report itself confirms the use, even if only ‘occasionally’ of the stables lands as an ‘inland feeding site used by Brent Goose’ “.

However, the Bord will know that Brent Geese need shallow descent/angles to land and take off from their traditional feeding grounds; therefore,

- The reason Ashtown Riding School lands are not always, but are more ‘occasionally’ used by Brent Geese is because of North/South hedgerows which prevent the Geese taking off if they land there, as their climb rate is inadequate to clear these obstructions.
- The Hedgerows bounding the Riding School lands are generally less than 5 m high.
- In contrast, the obstruction created by the proposed pedestrian structure at Ashtown Station is OVER 14 METERS IN HEIGHT AND EXTENDS FOR OVER 120 METERS ON PLAN.
- This proposed structure presents an increased risk of obstructing access to their traditional migratory feeding grounds, which are rated as important to their survival.

**It is unknown why this significant additional, and entirely avoidable, risk to a protected migratory bird species was not considered in the EIS.**

From the points just referred to above;

WE RESPECTFULLY confirm, as in our previous submissions, and as per our drawing submitted at Oral Hearing – that you **CONDITION** in any permission granted our

**“PROPOSAL TO REPLACE THE PROPOSED TUNNEL AND PEDESTRIAN OVER BRIDGE WITH A SHALLOW CUTTING FOR THE TRAIN LINES”** - stating among other points **‘No biodiversity loss’** :-- leaving Ashtown Road in place, with very little disruption - protecting the safe environs for future arrivals of Brent Goose to our area, as well as being of benefit to the humans coming & going, especially those within our Navan Road Community Council area - an ageing population.

**BATS;** not referred in above mentioned NATURA REPORT but of equal protected importance;

Bat Survey of Martin Savage Park area carried out by a Bat Group, on 5<sup>th</sup>, 6<sup>th</sup> & 7<sup>th</sup> September, 2023 using ultrasonic microphone and bat identifying app; ***“found 6 species of Bat during 113 minutes of recording over 3 nights.*** They counted:-

**PIPPYG – Soprano pipistrelle - 76**

**PIPPIP - Common Pipistrelle - 23**

**NYCLEI - Leisler’s noctule - 16**

**PLEAUR - Brown long eared bat – 6**

**PIP NAT - Nathusius’ pipistrelle - 3YS**

**MYOMYS – Whiskered myotis - 2**

They confirmed that **“ALL IRISH BATS ARE PROTECTED UNDER National and EU Legislation”**.

All of these areas; Ashtown Road; Ashtown Stables; Martin Savage Park open area, and indeed Royal Canal, contribute to and add to the beauty of the Tolka Valley area itself;

We again submit, as in our previous Submissions throughout this process - that **LOWERING THE RAIL LINE** under Ashtown Road, between the new Pelletstown Station and Navan Road/Parkway Station, leaving Ashtown Road open to all, pedestrians, cyclists, motor vehicles and the local horses from our close to a Capital City as to be rare in itself - or in our Professional adviser’s words, who prepared our drawing submitted to Oral Hearing - **‘Replace the proposed tunnel and pedestrian overbridge with a shallow cutting for the train lines’**

As we have stated throughout, we all support electrification of Maynooth line, but NOT, when it can be improved, **AT THE EXPENSE OF QUALITY OF LOCAL LIFE**, which includes the wildlife : - Please listen to and support our concerns, we are not saying NO, just do it better please. In our case, we are showing I. Rail, at no extra cost, how to do it with the Shallow Cutting.

Please acknowledge receipt in due course,

Patricia Dunleavy, Chair,  
Navan Road Community Council.  
10, Glendhu Park,  
DUBLIN, 7.