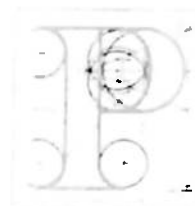


Our Case Number: ABP-314232-22



An
Bord
Pleanála

Sharon Weldon
22 High Park
Gracepark Road
Drumcondra
Dublin 9

Date: 08 December 2023

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

A Chara,

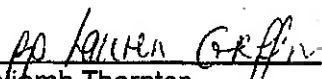
An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at 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

RA03

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: LAPS
Sent: Thursday 7 December 2023 15:53
To: 'Sharon Weldon'
Subject: RE: 314232 Observation- Railway Order updated Natura Impact Statement

Hi Sharon,

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

Kind Regards,

Lauren Griffin

From: Sharon Weldon [REDACTED]
Sent: Thursday, December 7, 2023 3:42 PM
To: LAPS <laps@pleanala.ie>
Subject: 314232 Observation- Railway Order updated Natura Impact Statement

To whom it may concern,

Please find attached my observation on case 314232- Dart West Draft Railway Order, Updated Natura Impact Statement.

I have been advised to submit my observation via email as I have previously submitted an observation through the ABP website this case.

Please acknowledge that you have received this email and that my observation has been submitted accordingly.

Best Regards,
Sharon

Sharon Weldon,
22 High Park,
Gracepark Road,
Drumcondra,
Dublin 9.

Observation on the draft Railway Order for DartWest case ref 314232

I am concerned that this additional significant information has been brought forward at such a late date, 15 months after the initial railway order submission date and over half way through the Oral Hearing. I really do question why Irish Rail did not include any assessment on the Impact to Brent Geese at Ashtown Stables in the initial railway order, considering the updated Natura Statement indicates the Brent Geese at Ashtown Stables were documented in submissions in the non statutory consultation. This gives me very little confidence that Irish rail has submitted all required data to make an accurate assessment on the project. It also makes me question what other significant data that Irish rail have conveniently failed to submit that is of significance to the project. Throughout the non statutory public consultation the Environmental data and impact was requested on numerous occasion by multiple members of the community, however Irish Rail would not provide this information. At the time this felt like the 9 options for Ashtown were generated without a significant assessment on the environmental impact. Therefore Irish Rail developed the plans without the supporting Environmental assessments, and are now refusing to alter their plan to support the protected species' habitats. Considering Irish rail failed to submit this additional significant environmental data as part of the initial railway order confirms their lack of consideration and respect to the environment on this project.

The current plan at Ashtown impacts Ashtown Stables and constructs an underpass. 6340 submissions related to Ashtown Stables were submitted in the non statutory public consultation 2. 6340 out of a total 8284 submissions on the whole line project related to Ashtown Stables. The community provided their insights on the plan for Ashtown. The main concerns noted from the community were for the project to not impact on Ashtown Stables and for an underpass not to be built. I really don't understand why Irish rail have disregarded this community feedback, and this omission of the assessment of Brent Geese at Ashtown Stables is another example of Irish Rail's disregard for the community's feedback. I also have to question why information related to Ashtown was submitted on days at the Oral hearing after the discussion on the Ashtown section had been completed. One point to note in relation to the CSPA which was updated in July 2023. The Oral Hearing commenced on 28 September. The updated environmental data was submitted on day 7 of the oral hearing, 11th October. Why was this only submitted half way through the Oral hearing, surely this should have been noted in advance and highlighted at the start of the oral hearing to ensure all data was available to all participants for the entirety of the Oral hearing. Particularly with respect to Ashtown, considering the additional information was submitted after the discussions on Ashtown at the Oral hearing had been concluded.

Brent Geese at Ashtown.- the study Irish Rail have referenced holds no merit in relation to Ashtown stables. Ashtown stables is a private property, therefore would obviously not be considered as part of this survey as the group have never entered the private property. I have seen the Brent geese feeding in the paddocks many times at Ashtown Stables myself. Therefore it is incorrect for Irish rail to state the ground is not suitable habitat considering the Brent Geese are often physically seen there. Irish Rail's statement is related to a desk stop

study, it is not scientific nor real life data gathering. As a qualified Scientist a desk top study is not appropriate for the scale of this project and its impact on protected species. During the Oral hearing Irish Rail confirmed they were not aware of Ashtown Stables when generating the initial plan for Ashtown. This again would demonstrate poor research on behalf of Irish Rail. If the team were not aware of Ashtown Stables then they couldn't possibly be aware of the Brent Geese that rely on the paddocks in Ashtown Stables for feeding nor the protected species of bats that reside there.

Country File BBC completed a segment on the Brent Geese in Ireland. Over the past 30 years the population of Brent Geese visiting Ireland has grown by 80%. All feeding ground is critical for them to survive. The Brent Geese eat half their body weight during their stay in Ireland. Competition and pecking order comes into play when they are feeding; hence all feeding ground is crucial for them. Similar to the study- "www.dublinbrent.se", the Brent Geese feed at Martin Savage Park, and when people disturb them walking with dogs etc they also use Ashtown Stables as a safe secure area to feed. As per "www.dublinbrent.se" when the football pitches are destroyed by matches, the geese often rely on other areas. This is seen in Ashtown when the Martin Savage park football pitches turn to mud, the Brent Geese rely on the paddocks at Ashtown stables to feed. It is not acceptable for Irish Rail to devise a plan that impacts or removes feeding ground for a protected species. The current plan for Ashtown removes the feeding ground that the Brent Geese utilise at Ashtown Stables. I am disturbed to read this plan that results in the destruction of an area that protected species utilise.

There is no record of pygmy shrew in the Irish Rail's environmental data. There is a population of the pygmy shrew nesting at Ashtown Stables and the Ashtown area. Again, this omission of a protected species is most likely the result of a defective desk study. The loss of hedgerow at Ashtown Stables has still not been mitigated. The protected bats roost here. They can be seen on summer evenings flying amongst the paddocks. The protected Pygmy Shrew reside in the hedgerow. There is a seasonal colony of bees that reside in the hedgerow. There is a bill currently in generation to protect hedgerows in Ireland. "The Protection of Hedgerows Bill 2023" has been drafted and launched in the bar of Ireland on 04 Decemeber 2023. It has been confirmed by the Green Party that this Bill will be introduced to the Oireachtas next year. The project has highlighted the native hedgerows corridors are fundamental to the Irish landscape "because of their significant contribution to biodiversity, flood control, soil protection, carbon storage, shelter, shade, animal welfare, pest control and beauty". The hedgerows in Ireland are protected under "Section 40 of the Wildlife Act 1976 as amended by the Wildlife (Amendment) Act 2000 and the Heritage Act 2018", whereby it is restricted to cut hedgerows between 01 March and 31 August each year. It is incredulous to think an Act exists to prevent cutting hedgerows during a certain period of the year, whereas Irish Rail deem the complete destruction of the same hedgerows acceptable. Again another example whereby Irish Rail have disregarded environmental data to devise their project.

Ashtown Stables is haven for wildlife. I really hope the Board does the right thing to save our protected species.

Regards,

Sharon Weldon

BSc Analytical Science.