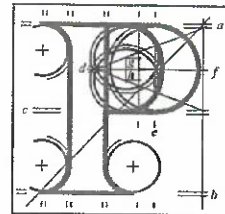


**Our Case Number:** ABP-314232-22

**Your Reference:** Aviva Life and Pensions Ireland DAC



**An  
Bord  
Pleanála**

Virtus  
5th Floor  
The Glass House  
11 Coke Lane  
Smithfield  
Dublin 7  
D07 WNP2

**Date:** 18 November 2022

**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 (including your fee of €50) 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.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

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. 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 (No Receipt to Issue)

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
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Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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<b>AN BORD PLEANÁLA</b>	
LDG-	<u>058622-22</u>
ABP-	
28 OCT 2022	
Fee: €	<u>50.00</u> Type: <u>Submission</u>
Time:	<u>13.59</u> By: <u>handl.</u>

An Bord Pleanála  
64 Marlborough Street,  
Dublin 1, D01 V902

Date: 28<sup>th</sup> October 2022

**RE: SUBMISSION ON DART+ WEST RAILWAY ORDER – DUBLIN CITY TO MAYNOOTH AND M3 PARKWAY IN RELATION TO PROPOSED WORKS AROUND ASHTOWN GATE COMPLEX, ASHTOWN**

**AN BORD PLEANALA REFERENCE NUMBER: 314232**

Dear Sir/Madam,

**1.0 INTRODUCTION**

- 1.1 This submission is made on behalf of our client, Aviva Life & Pensions Ireland DAC, Building 12, Cherrywood Business Park, Loughlinstown, Dublin 18, D18 W2P5.
- 1.2 This submission relates specifically to that part of the overall Railway Order proposals which relate to a proposed local distributor road to replace the existing Ashtown Road, with particular relevance to our clients' properties at Block B & D, Ashtown Gate, Ashtown, Co. Dublin.
- 1.3 The key grounds that our client raises in this submission relates to the following:
  - Accessibility into Ashtown Gate Car Park
  - Construction Period Traffic Disruption
  - Comments on Pedestrian/Cyclist Infrastructure Improvements-
- 1.4 We enclose the observation fee of €50 with this submission.

**2.0 BACKGROUND AND CONTEXT**

- 2.1 Aviva Ireland (hereinafter referred to as 'Aviva') have a number of commercial properties located around the Dublin region, including Block B & D at the Ashtown Gate Complex in Ashtown, Co Dublin. There is around 500 workers currently working between both blocks, with around 345 car park spaces available through both the underground car park and above ground spaces, in turn creating significant daily car usage entering/exiting the car park each day.

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**Figure 1- Location of Ashtown Gate Complex in relation to Ashtown Railway Station**



- 2.2 From the outset, Aviva welcome the proposed Dart+ West programme, believing that when complete it will add significant benefits to its tenants and broadly welcomes the plan to expand the Dart network to the Ashtown area.
- 2.3 Notwithstanding the above, there are concerns in relation to the proposed works to be undertaken in the vicinity of Aviva's properties, located on the Ashtown Road.
- 2.4 Access to the Ashtown Gate Complex is currently located to the west of the Ashtown Road, but the proposed works would see this exit merge onto a new local distributor road, diverting the existing road network to the west of Ashtown Station in replacement of the existing road network and level crossing.

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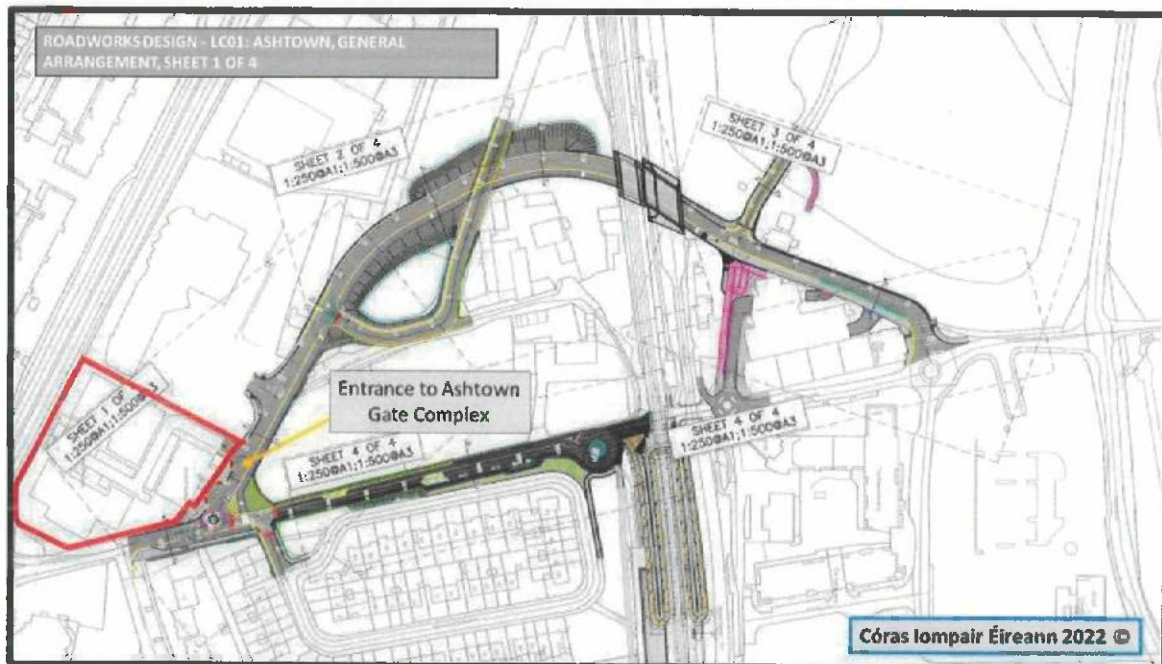
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**Figure 2- Proposed Access onto Local Distributor Road from Ashtown Gate Complex**



2.5 The proposed works are considered to have the potential for disruption to Aviva's tenants using the car park facility on a daily basis.

2.6 The concerns in relation to the above proposed works is set out in Section 3 below.

### 3.0 GROUNDS OF OBSERVATION

#### Accessibility into Ashtown Gate Car Park

3.1 There are concerns as to the accessibility into the main vehicular entrances for the Ashtown Gate Complex Car Park following the construction period and realignment of the road network.

3.2 At present, access is provided off the Ashtown Road into two separate car parks, one directly off the laneway to an underground facility, while the other situated further west, linking to the above ground car park in serving Block B & D.



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**Figure 3- Existing Car Park Entrances Locations**



- 3.3 The revised junction layout proposes direct access from the rear entrances of the Ashtown Gate Complex, thus making it more challenging for tenants/users to leave the property without the benefit of a signalised junction for easy access and egress.
- 3.4 Additionally, there are no yellow boxes indicated on the drawings as seen in the figure below, raising safety concerns for Aviva and their tenants.

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**Figure 4- Location of Car Park Entrances merging onto new Local Distributor Road**



- 3.5 Whilst Aviva accepts that the overall design is the preferred option, and ultimately provides a more direct route out of the complex, the observation is raised as to the possible mitigation measures that could be introduced to make it more accessible to their tenants when implemented.
- 3.6 The reality is that the entrance to Ashtown Gate is very close to the junction, and the proposed upgrade to the road will materially increase traffic volumes on the road. With the provision of a yellow box in front of both entrances, it will allow for easier and safer entry & exit to the complex, in turn providing greater reassurance to Aviva and its tenants when the programme of works has been completed.
- 3.7 This, in addition to visibility mirrors or signage highlighting or other such measures, the entrance to the car park would have significant benefits to all road users and allow easier manoeuvrability to the complex in the future.

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**Construction Period Traffic Disruption**

- 3.8 There is a lack of information provided within the Construction Management Plan to indicate the proposed period of traffic disruption that will take place during the change over from the existing Ashtown Road, and its connection with the Local Distributor Road.
- 3.9 Our client notes that this new distributor road will alleviate the traffic issues facing the existing linkage over the Ashtown Railway Crossing & Royal Canal River but will need to be co-ordinated appropriately to ensure minimal disruption during peak morning and evening periods.
- 3.10 It should also be noted, that while this observation directly relates to the DART+ West Programme, the impacts of the Bus-Connects project from City Centre to Blanchardstown will also affect the upper parts of the Ashtown Road and Roundabout over the coming years.
- 3.11 In the interest of the local community and workers using the local road network, there should be co-ordination between both projects to create as minimal disruption as possible, as the constant traffic congestion will make it unsustainable in the construction timeframe, producing unnecessary air and noise pollution directly into the Ashtown Gate Complex Blocks.
- 3.12 It is requested that, to avoid potential major disruption caused during the construction period, a specific management programme and traffic management plan should be agreed prior to commencement of works, to give a clearer indication for all those potentially impacted of the mitigation measures proposed. It is strongly submitted that such general and traffic management measures should be agreed as part of the Railway Order process to allow for full transparency and engagement in the process.

**Comments on Pedestrian/Cyclist Infrastructure Improvements**

- 3.13 The addition of a wider pedestrian path along the edge of the Ashtown Gate complex, signalised pedestrian crossing, along with enhanced and segregated cycling tracks, will add significantly and positively to the area and allow for Aviva's tenants to have greater modal choice when travelling to work each day.



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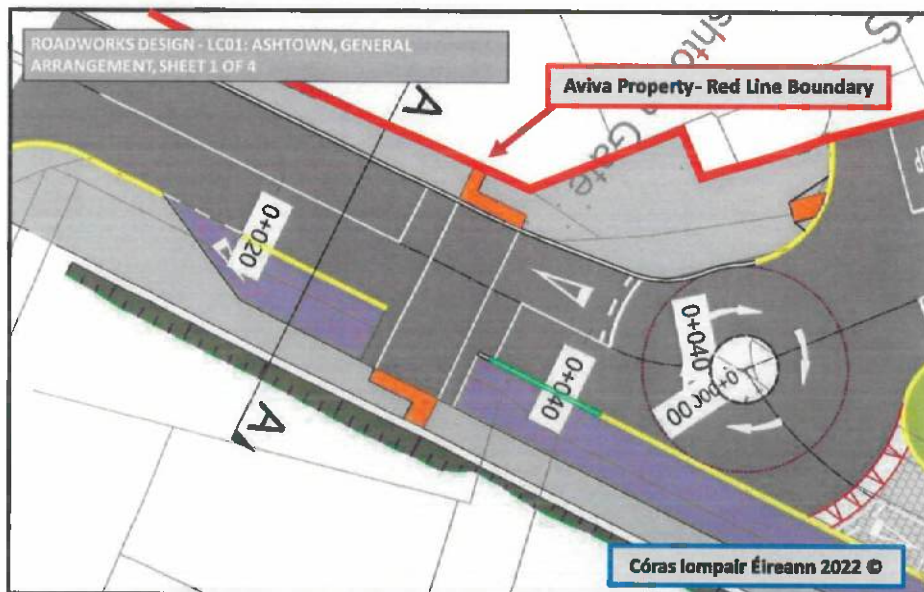
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**Figure 5- Proposed Pedestrian Crossing Location**





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- 3.14 We would note however that the location of the pedestrian crossing may introduce issues with its interaction to the road users, as the existing straight road section connecting to the Ashtown Station is proposed to be replaced with a small roundabout which offers pedestrians no real protection from speeding vehicles around corners.
- 3.15 The creation of a dedicated walking and cycling connection on the route of the existing road will allow for more users to travel from the Dart+ Station at Ashtown, and travel to work by sustainable modes.
- 3.16 This can only be achieved in a safe manner with the guarantee that all measures have been taken to ensure speed limits are not exceeded by motorists, and blind spots are well covered to prevent any major accidents, particularly for oversized and blind spot prone vehicles.
- 3.17 It is submitted that a review of the submitted design proposals should be considered, with particular attention given to the interaction of road vehicles with pedestrian and cyclist infrastructure, as Aviva believes there is potential for serious accidents if not addressed.

#### **4.0 SUMMARY AND CONCLUSIONS**

- 4.1 The proposed improvements to the Irish Rail network in the Ashtown area are very much welcomed by Aviva, as it will enable tenants and workers to use more sustainable modes of travel to access the Ashtown Gate Complex for work each day.
- 4.2 The measures that are proposed to improve the wider network are acknowledged by Aviva to have the potential to create wider economic benefits to the region, however, Aviva consider that the scheme has the potential, during both operational and construction stages, to both negatively impact existing and future commercial tenants and operators in the area.
- 4.3 Aviva has raised several concerns and possible measures to improve the programme of works, as summarised below:
- Appropriate road signage and markings to ensure the entrance to the Ashtown Gate Complex is not hindered by vehicles blocking exits during busy periods.
  - Requirement that prior to commencement of works, an appropriately detailed construction programme and traffic management plan are put in place.
  - A review of the proposed pedestrian crossing and its interaction with road users, given its design and location potentially raising safety concerns.

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- 4.4 We respectfully request that this observation is taken into account in the consideration of Dart+ West Railway Order Application and look forward to the outcome of the decision in due course by An Bord Pleanála.

Yours faithfully,

*Robert Keran*

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**Robert Keran**  
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