

**An Bord Pleanála case number: 314232**

**Description:** DART+ West Railway Order - Dublin City to Maynooth and M3 Parkway

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Ashtown Stables  
Pelletstown House  
Ashtown  
Dublin  
D15 HFX5  
27<sup>th</sup> October 2022

A Chara,

As the owner of Ashtown Stables, I wish to communicate my observations regarding the proposed taking of my land by Irish Rail (An Bord Pleanála case number: 314232).

I strongly oppose this land take. It is a clear overreach by the state rail body, disregards thousands of submissions sent to Irish Rail and will result in irreversible damage to the community of Ashtown and its unique environment.

I would also like to formally request an oral hearing for this application.

Kind regards,

*Christopher Reid*  
Christopher Reid

<b>AN BORD PLEANÁLA</b>	
LDG-	<u>058572-22</u>
ABP-	
27 OCT 2022	
Fee: €	<u>50.00</u> Type: <u>cash</u>
Time:	By: <u>havel</u>

**The observations of Christopher Reid: owner of The Ashtown Stables on the detrimental effect the proposed DART+WEST will have on the riding school and the community**

**Background Information:** Ashtown nestles at the edge of the metropolis, with the Royal Canal running through it. On the north side it has the Tolka valley and on the south side it has Phoenix Park. To the west is Ashtown Stables on the grounds of Pelletstown House. The Stables is situated in Pelletstown Co. Dublin. Its history can be traced back to 1177. The house and stables can be clearly identified on all of the old maps of the area. The number of people that resided there in 1911 is detailed in the census of the same year, as is the number of stables. The land has five entrances. The formation of the land can be best described as a triangle.

> To the east, it borders The Ashtown Road, over half of which also forms part of the property.

> To the west, it borders Mill Lane.

> To the north, it borders a piece of disused ground that contains the otter pond. This disused ground was recently purchased by Irish Rail / CIE and runs parallel to the railway line. It has not been safely maintained by Irish Rail and we have attended to at least one fire there that threatened our property, animals and people.

The Ashtown Stables is the last riding school in Dublin City. Until recently there were at least nine riding schools within a few miles of The Stables. Seven of them have been bought by developers and have been built upon. One is waiting for planning permission and will soon be built on. There has never been a shortage of developers with blank cheques who were hungry to develop The Stables and the land that it is on. It is now the last piece of undeveloped land in Ashtown because by and large, developers accepted that it was not for sale. They came to understand that the Reid family had no intention of selling it for building development. The Reid family, on the other hand, decided to use it for the development of community and people, particularly children and women who may have no interest in field sports. They choose to spend time outdoors and be with animals. Not all children want to play contact sports. The Stables gives them the opportunity to be outdoors, be active and learn to care for and ride a horse. It is for the vast majority of our clients, the only place where they come face to face with nature.

When Irish Rail blindsided us with plans to demolish The Stables last summer, over 6,500 objections and personal testimonies were submitted to Irish Rail in our support. Partly due to the communal, political, national and international support, Irish Rail backed off its proposal for the complete demolition of The Stables. However, Irish Rail misled us, politicians and the media when they claimed that The Stables would not be significantly impacted by the revised plans. When their bad publicity died down, Irish Rail returned with a rehashed plan: albeit it will not demolish Ashtown Stables with one fell swoop. It will do so instead by a thousand cuts.



The Reid Family was first made aware of the proposed project two years ago, and informed that it **may impact** on The Ashtown Stables. A circular was later issued to us and a number of houses beside us. Irish Rail had taken the liberty of wiping The Stables off the face of the earth. We no longer existed. This set the tone for our dealings with Irish Rail. I had experienced arrogance and a lack of common courtesy from them on previous occasions, from their contractors on the various projects that Irish Rail have carried out beside us over the years - but this was shameful.

As it turned out Irish Rail did The Stables a favour. Support came from all over the country and the world and the Save Ashtown Stables Campaign was born. The campaign took on a life of its own with over six thousand objections to Irish Rail's proposed demolition of The Stables. When the project was in its infancy and the future of The Stables came up for discussion, it was reported that The Stables would be compulsory purchased and that when the project was finished, the remainder of the land would be sold off to a developer.

**The Impact on the Community:** South of the Royal Canal consists of several established vibrant lively communities that stretch all the way to the Phoenix Park. Most have lived there all of their lives, and take pride in where they live. There is also an office block and numerous small businesses on this side of the canal. On the northside of the canal there is a relatively new community: with a lot of the residents coming from all over Ireland and from much further afield. There are a large number of high rise buildings, which are by and large a new concept to the area. The four most popular activities are evenly divided: with Soccer and Rugby north of the canal, and Gaelic Games and Horse Riding on the southside. The parents that live here make a special effort to involve their children in activities on both sides of the canal. They realise only too well that it is much easier for children to integrate and make friends when they are young. On the north side of the canal, there is a shopping mall, and all the different services available. This district is used by the communities and office and business workers on both sides of the canal. They go about their business crossing the bridge, several times a day, without having to run through a tunnel on a dark winter's evening or climb bridges or ramps on an icy morning.

It is no exaggeration to say that the village of Ashtown has a nice feel to it. The stroll along the canal is comparable to any of the walks that are to be found throughout Europe. The communities on both sides of the canal mingle with each other effortlessly. But Irish Rail do not appear to be interested in communities, or for some reason think it's okay to prioritise connecting communities to Dublin, destroying those *within* - **slapping ill-considered, ugly, completely out of context structures**, that would be better suited for a working quay or a highway in the Middle East or USA, than on the banks of Dublin's Royal Canal. Did they consider for a moment how the structure they propose to erect in Ashtown is going to fit in or affect



the community? Older people and people with mobility challenges will only go through a tunnel or climb up and down the bridge as a last resort, if at all, and will as a consequence spend more time indoors, which in the long term will be detrimental to their health and wellbeing. The community will in effect be operating without its full complement. The proposed structures are no better for children. It will increase the risk of bullying for them, particularly if they are late for school, are separated from their friends or if they have to slip across to the mall. At present they are under the watchful eye of the community, and bullies by their very nature don't operate in the open. The proposed project will create a permanent division between Finglas and Ashtown, cutting both communities off from each other. The emphasis should be on integrating communities. This is essential for the community on the Finglas side of the canal that has a large population of people from other European countries. They are keen to learn how to speak English and be able to communicate with their neighbours. They want their children to assimilate, and become part of the wider community. Irish Rail's dividing line will in addition prevent the Ashtown community from free access to the canal and the Tolka Valley. At present both communities move freely across the bridge, and can shop or socialise at their leisure. They also have unimpeded access to the Phoenix Park, The Royal canal and the Tolka Valley.

**Cycle Lane and Roundabout:** Irish Rail states that wherever possible they will stay within their own boundaries and as a last resort attempt to procure additional land. Now is a good time to look a little closer at the proposed cycle lane and ask the question: what right do Irish Rail have to take The Ashtown Stables land, the property of one popular existing local amenity, and transfer it to what I can only presume is another local amenity? Do Irish Rail see themselves as some sort of a levelling up God?

Ashtown Road, of which we own more than half, is a little over four metres wide with a maximum weight capacity of three and a half tonnes. Irish Rail's plans to replace this with a new road on Mill Lane which now becomes a 6.5 metre wide carriageway, with a 1.5 metre rubbing strip on the western side of the road, and a 3.65 metre wide cycleway along the eastern side of the road. One of the drawings shows a planned roundabout on The Stables land, on the very spot where Martin Savage was shot dead by the British at the very beginning of the War of Independence; where the Brent Geese visit each year; and where our mares nurture their foals in their infancy. Irish Rail's CEO and senior DART West team sat directly in front of me and my family and told us untruths about their plans.

**The Tunnel:** or underpass as Irish Rail call it in their brochures. The National Development Plan does not make any provision for any new tunnelling, and this is probably why Irish Rail prefers to use the word underpass, for the major engineering project that they are proposing. It involves tunnelling under two mill ponds without any local input or local history. It then involves tunnelling under the railway line, the canal, and an underground river. All the while they will have to monitor the Tolka



Flood Plane, and an unknown number of sinkholes. Irish Rail will find out the hard way, whether it was an underpass or not. Or more to the point the taxpayer will find out. Leaving that to one side I will move on to the variation in water levels between the Tolka Flood Plane and the Royal Canal. That is critical in order to facilitate the rainwater flowing from the bottom of the proposed tunnel, into the Tolka Flood Plane, and not the other way around, which is more than likely, given the depth the tunnel has to go down in order to provide sufficient headroom for the traffic that will use it. Irish Rail have made no provisions as to how they intend to deal with the additional rainwater that will build up at the bottom of Mill Lane.

The base of the canal is 5.4 mts, (18' 0") below ground level, which is lower than the level that the Tolka River rises to when it is flooded. Irish Rail plans to tunnel down approximately 6/7 mts. They have refused to produce a solution to this problem. They will also have to contend with rising sea levels which in turn will raise the level of the Tolka Flood Plane. This will cause the water levels in the tunnel to rise. This particular problem needs further investigation. In December 1954 during a heavy downpour the Tolka flood waters stretched back as far as the canal, this is something that Irish Rail are clearly choosing to ignore. The ruins of the old cottages that were abandoned during the storm can still be seen today, the people that lived in them never returned, they had enough of their homes being destroyed on a regular basis. The danger signs are there for all to see except Irish Rail. Irish Rail are proposing what is an impossible engineering project.

**The Impact on Wildlife and the Horses:** The proposed new project is being marketed as a green, environmentally friendly project. In reality it will be nothing of the sort. They will be eliminating a green corridor that links the Phoenix Park with The Tolka Valley.

Despite Irish Rail's admission that their proposal would affect species both within and outside the construction footprint, the disturbances that will occur during construction of the proposed carriageway and tunnel as detailed by Irish Rail have not been addressed. Irish Rail proposes completing a major construction project in the midst of a riding school in a built up urban area. Not only the noise and lighting that will cause serious ill-health, but Irish Rail states that "direct mortality is possible as result of site clearance, tree felling and vegetation removal." What Irish Rail seem to be proposing is that The Ashtown Stables should be able to carry on business as usual, in the middle of one of the largest construction sites in the country. A construction site that will be operational from seven o'clock in the morning until seven o'clock at night with the probability of it being a 24/7<sup>1</sup> site. At any given time there is a possibility that the clients and the staff could be working with horses - trained or in-training, or caring for children with additional needs. It is impossible to legislate as

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<sup>1</sup> DART-WEST, Environmental Impact Assessment Report, Page NTS/42



to how horses will react at the best of time, but I can tell you without fear of contradiction that what Irish Rail is proposing is a recipe for disaster.

The horses at The Stables have predominantly been bred, born and raised in The Stables, as have their parents and grandparents. They have been trained over years and years for the important function that they now undertake. Irish Rail have made no suggestions or proposals as to how they expect the horses to live in the middle of a building site, with all the appending trucks, excavators, cranes, teleports, machines, lighting, drilling, flooding, beeping, shouting ... it will leave The Stables inoperable.

What are the children that ride in The Stables at present expected to do? At the moment they can access The Stable by walking, cycling, bus or by train. Irish Rail also proposes to take the top paddock, the field where the newborn foals spend their first couple of months, with their mother. This is because we too plan for the future and the next generation of animals and children - as noble and important as the sustainability of transport and climate . To some children and adults, those horses serve a more vital role than any friend, doctor, therapist or medication ever will. If Irish Rail succeed with their plan, it will bring an end to their stables and their hobby.

**Conclusion:** Irish Rail have no need to leave their own property. Why are they proposing to travel three hundred metres, to build a cycle track and a roundabout? How in the name of reason can building a cycle track on land they do not own, improve the rail network? Why are they getting involved in constructing a four and a half metre carriageway on land that they do not own? Irish Rail are aware that the owners of the said land have refused to sell to numerous developers for mouth watering sums, but there are some things in life that money cannot buy.

Irish Rail should recall the oath that medical students must take " primum non nocere" - "first do no harm". It is into this territory of doing harm that Irish Rail have now strayed. Most if not all people are all in agreement that after one hundred and sixty years of neglect, William Dargan's railway is crying out for major improvements. The dilapidated state of our national railway can not be rectified overnight, and producing a trainload of glossy brochures, and costing billions of euro to the taxpayer will not solve the problem. Destroying a successful functioning amenity and an established community in an effort to prop up a malfunctioning, exchequer funded railway system, is not the answer. And no amount of glib phrases or public relations speak is going to change that. Irish Rail are being disingenuous if they think it will.

I am in favour of a reliable and efficient train service. I am the first to admit that our rail service does not compare favourably with our European neighbours. It is not a service that I use. Despite living beside a station, I prefer to walk through the Phoenix Park when I go to the city, but nonetheless I am a great believer in our

country having a cost effective rail network, and am a great admirer of William Dargan. You will understand that it is with a tinge of sadness that I feel duty bound to point out some of the shortcomings and oversights of Irish Rail's proposals. It has given me no satisfaction to highlight Irish Rail's failings, but I am also aware that this is the only occasion in my lifetime that they have been given proper funding. I would like to recall for them what I was taught sixty years ago when I began my engineering career: measure twice, cut once. I would also like you to understand that, I along with my family and our loyal supporters have worked tirelessly on The Stables for forty years - and we will keep doing so.

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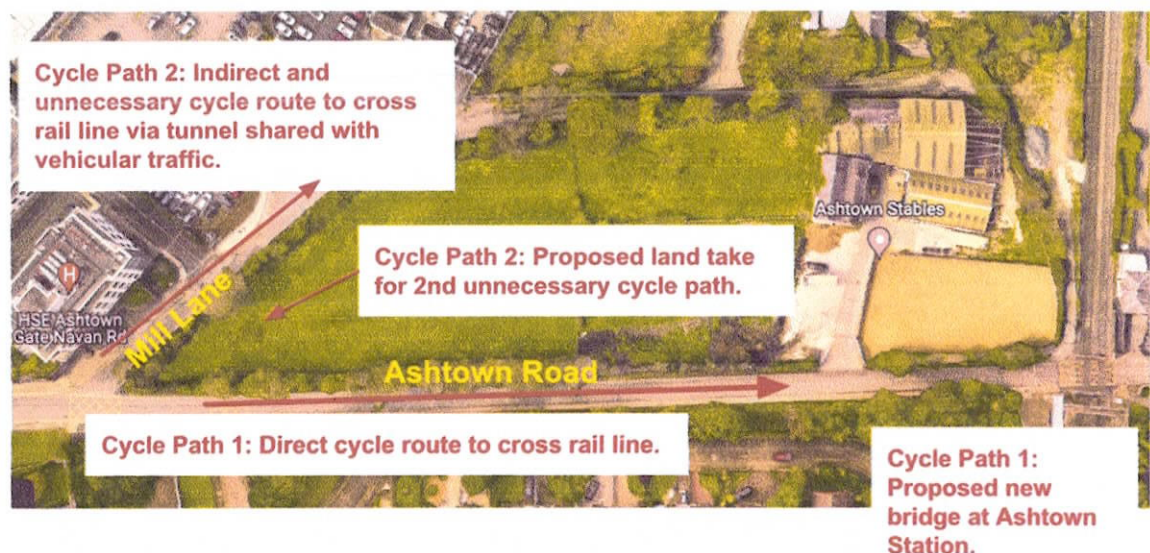
  
Christopher Reid



## Observations:

### 1. Irish Rail plan to forcibly take land belonging to Ashtown Stables with the aim of constructing an unnecessary second cycle path at Ashtown.

- 1.1. There are currently no cycle paths at Ashtown.
- 1.2. As part of Dart+ West, Irish Rail plans to build two new cycle paths at Ashtown, on both Mill Lane and Ashtown Road.
- 1.3. The proposed locations of the new cycle paths at Ashtown are presented in Figure 1.



**Figure 1: Proposed Ashtown Cycle Paths.** (Source: Google Earth and [Ashtown Revised Preferred Option Report, March 2022](#) ).

- 1.4. Proposed cycle path 1 on Ashtown Road follows a direct route over the rail line and involves the proposed construction of a new cycle bridge located next to Ashtown Station.
- 1.5. Proposed cycle path 1 provides a direct and safe route across the rail line.
- 1.6. Proposed cycle path 2 on Mill Lane is a dangerous and unnecessary overdevelopment of Ashtown by Irish Rail. This path follows an indirect route over the rail line, through a proposed tunnel that must be shared with vehicular traffic. Note, the addition of a tunnel to the Ashtown area has been resoundingly

rejected by Ashtown residents, as evidenced by the thousands of submissions received by Irish Rail on this matter.

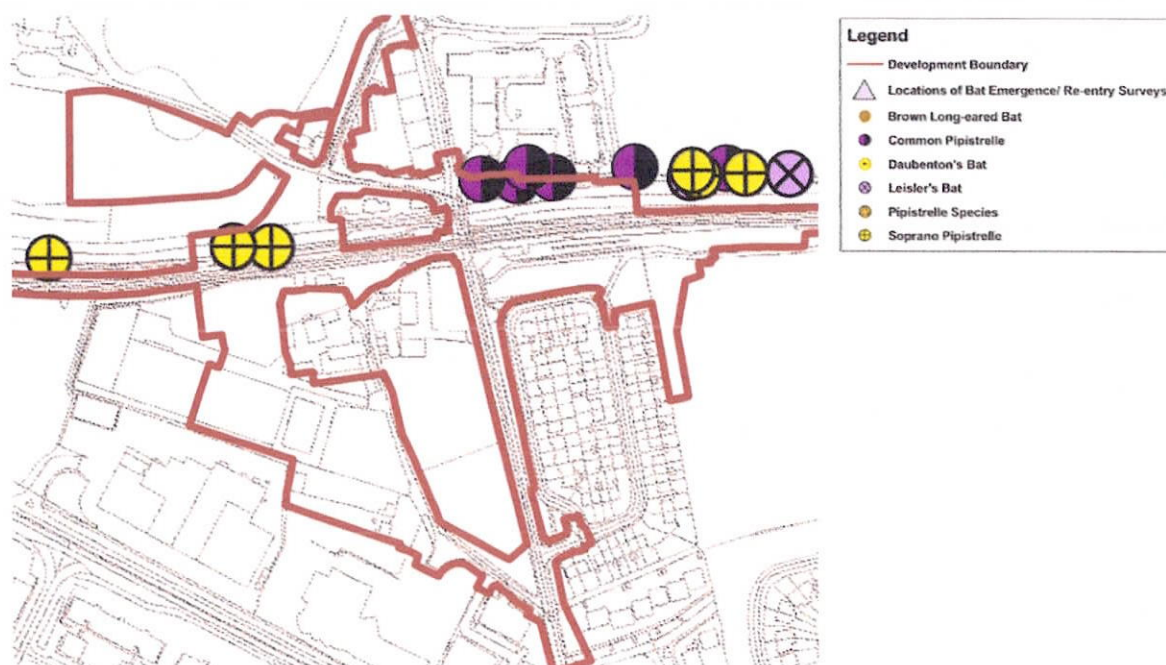
- 1.7. Proposed cycle path 2 necessitates the forcible taking of land owned by Ashtown Stables that is approximately 300m from the rail line.
- 1.8. Proposed cycle path 2 adds unnecessary expense to the Dart+ West project and does not align with the stated aim of this project. The aim of the Dart+ West project is to "increase train frequency and passenger capacity along the Maynooth and M3 Parkway Lines." (See: [Ashtown Revised Preferred Option Report, March 2022](#)).
- 1.9. The aim of Dart+ West is not to construct cycle paths along the route of the project. This deviation from Irish Rail's stated aim is a clear overreach by Irish Rail.
- 1.10. At the pre-application consultation meeting between Irish Rail and An Bord Pleanála that was held on 08/03/22, An Bord Pleanála noted that there was a "substantial amount of infrastructure being provided" at Ashtown see: ([ABP-306587-20 Railway improvement works on the Maynooth Line and City Centre enhancements as part of the DART expansion programme](#)).
- 1.11. A second and unnecessary cycle path only adds to the "substantial amount of infrastructure" proposed at Ashtown.
- 1.12. The addition of a cycle lane at Ashtown is not consistent with Irish Rail's own definition of "railway works" as defined in the '[Draft Railway Order, July 2022](#)'.
- 1.13. Irish Rail define "railway works" as "*any works required for the purposes of a railway or any part of a railway, including works ancillary to the purposes aforesaid such as the elimination, closure and upgrade of level crossings, the provision of bridges including road-over-rail bridges, provision of electrical traction infrastructure, environmental mitigation measures, the parking of vehicles by persons who intend to complete their journey by railway, and relocation of utilities, and in this definition "works" includes any act or operation of construction, excavation, tunneling, demolition, extension, alteration, reinstatement, reconstruction, making good, repair or renewal;*"
- 1.14. This list does not include cycle paths.
- 1.15. Proposed cycle path 1 provides an alternative route to cyclists following the proposed closure of the Ashtown level crossing. However, proposed cycle path 2 is not covered in this definition.



- 1.16. Proposed cycle path 2 will result in the destruction of the habitat of protected Brent Geese species. See Objection 3 below.
- 1.17. During Irish Rail's public consultation 2, the inadequacies of their cycle and pedestrian 'study' for Ashtown was established and made known to Irish Rail. The purported 'study' assessed a single day, made no account for a myriad of variables like weather and ignored the most basic of general scientific principles. (See Appendix 1 for further information).
- 1.18. Subsequently, this discredited 'study' did not appear in the [Revised Ashtown preferred option - Option Selection Report](#).
- 1.19. Irish Rail failed to include any supporting cycle / pedestrian data at Ashtown.
- 1.20. Did Irish Rail carry out a new study but not include it in the Revised Ashtown preferred option - Option Selection Report? Or do Irish Rail lack any credible cycle / pedestrian data for Ashtown?
- 1.21. Irish Rail want to forcibly take land from Ashtown Stables for a cycle lane at Ashtown but potentially have no credible cycle / pedestrian data for this area.

## 2. Irish Rail plan to construct two tunnels at Ashtown despite the presence of protected bat species at this location.

- 2.1. [Irish Rail's Bat Survey](#) identified the presence of protected bat species at the location of their proposed tunnel under the rail line at Ashtown. See Figure 2

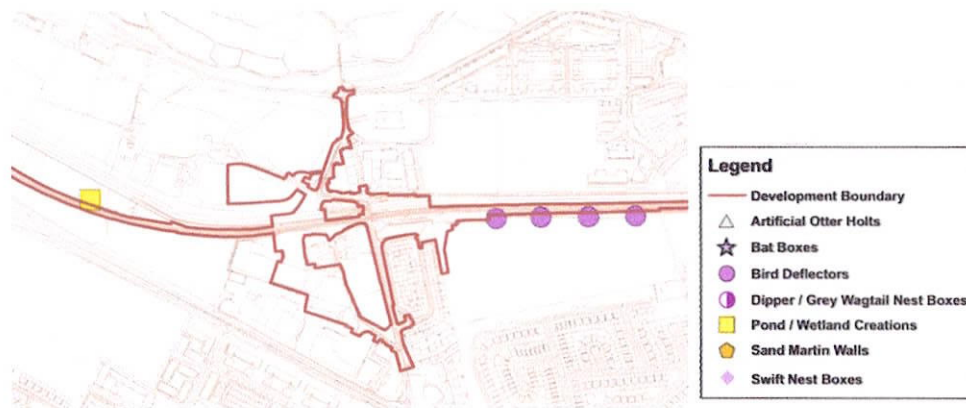


**Figure 2: [Irish Rail's Bat Survey](#)- Screenshot of Ashtown Diagram**

- 2.2. Ashtown Stables conducted an independent Bat Survey of the Ashtown area.
- 2.3. This study highlighted the presence of a variety of additional species in the Ashtown area. (See Appendix 2)
- 2.4. If Irish Rail's bat survey failed to detect the presence of these additional species, how can we be certain that their data is fit for purpose and that their development at Ashtown will not adversely affect these protected bat species?
- 2.5. Ashtown Stables shared this bat survey data with Irish Rail. Did Irish Rail inform An Bord Pleanála of the presence of these additional protected bat species? Their presence at Ashtown is not indicated on maps published in the Railway Order.



- 2.6. Not only have Irish Rail failed to provide a robust assessment of the bat species present at Ashtown, but they have also failed to address the impact the addition of two new tunnels on Mill Lane will have on local bat populations.
- 2.7. Irish Rail have failed to provide even basic mitigating measures for local bat populations i.e. bat boxes. See Figure 3.



**Figure 3: Irish Rail's [Mitigation & Enhancing Mapping \(Sheet 3\)](#) - Ashtown**

### 3. Irish Rail have refused to share information on Brent Geese feeding sites with the public.

- 3.1. Irish Rail's [Environmental Impact Assessment Report Volume 3A: Technical Figures July 2022](#) states that "due to the sensitive nature of protected species locations shown on this drawing, they are confidential and are not provided to the public".
- 3.2. The 'confidential' documents that Irish Rail refuse to make public are: MAY-MDC-ENV-ROUT-DR-V-80050-D to MAY-MDC-ENV-ROUT-DR-V-80061-D.
- 3.3. Why is this secrecy necessary? Brent geese roam freely on grasslands throughout Dublin. The locations of this protected species' feeding sites must be made public in order to ensure their feeding sites are protected.
- 3.4. Irish Rail's failure to allow public access to these 12 'confidential' documents is both outrageous and inconsistent as they have provided a Brent Geese feeding site drawing in the Natura Impact Statement ([Appendix F Light-Bellied Brent Geese Feeding Areas](#)).
- 3.5. During public consultation number 2, Irish Rail were informed that the Brent Geese Feeding Locations map information they were using was not accurate as

it did not indicate the presence of a Brent geese feeding site on Ashtown Stables' land.

- 3.6. Irish Rail however did not include this information regarding the Brent Geese feeding site that is located on Ashtown Stables' land in their Railway Order. ([Appendix F Light-Bellied Brent Geese Feeding Areas](#)).
- 3.7. Perhaps these "confidential" documents contain information regarding the Brent Geese feeding site on Ashtown Stables' land?
- 3.8. Ashtown Stables have never granted access to Irish Rail to study Brent Geese feeding sites on their land and any unauthorised access by this body would violate the Transport (Railway Infrastructure) Act, 2001.
- 3.9. Without access to these documents, Ashtown Stables can not be sure if any such study was carried out by Irish Rail.
- 3.10. Irish Rail changed their assessment of Option 2 (their previously preferred option for Ashtown) in terms of the impact this option would have on Brent Geese from Public Consultation 2 to the Public Consultation 3 (Ashtown). What was the rationale behind this change? (Note, this option was revised in the additional Ashtown Local Consultation but not in terms that would potentially affect the Brent Geese). What supporting information did Irish Rail use that lead to this change?

#### **4. Irish Rail have incorrectly stated to An Bord Pleanála that the proposed option for Ashtown "will primarily remove impacts on Ashtown Stables."**

- 4.1. Irish Rail's current preferred option for Ashtown no longer involves the complete annihilation of Ashtown Stables.
- 4.2. However, it is both wholly incorrect and insincere of Irish Rail to conclude that their current preferred option "will primarily remove impacts on Ashtown Stables". ([ABP-306587-20 Railway improvement works on the Maynooth Line and City Centre enhancements as part of the DART expansion programme](#)).
- 4.3. Irish Rail received thousands of submissions objecting to the taking of Ashtown Stables' land.
- 4.4. However, Irish Rail's [Railway Order](#) still details the proposed taking of three different parcels of Ashtown Stables' land.



- 4.5. By Irish Rail incorrectly concluding that their preferred option “will primarily remove impacts on Ashtown Stables” it shows a complete lack of understanding of the impact any land take would have on Ashtown Stables’ business.
- 4.6. Have Irish Rail considered the impact of years of construction work would have on the health and well being of the horses that live at Ashtown Stables?
- 4.7. Have Irish Rail carried out a risk Assessment on the dangers and likelihood of an accident occurring when operating heavy machinery in close proximity to a busy stables?
- 4.8. Have Irish Rail risk assessed their proposed replacement boundaries in terms of the likelihood of a horse escaping?
- 4.9. Has the potential impact to the viability of Ashtown Stables’ business by the partial closure of Ashtown Road been addressed by Irish Rail?
- 4.10. Have Irish Rail considered the impact that restricted access to Ashtown Road would have in terms of Health & Safety implications (for example fire safety)?
- 4.11. If Irish Rail had thoroughly considered the above points, would they be so quick to state that their preferred option “will primarily remove impacts on Ashtown Stables”?

## Appendix 1

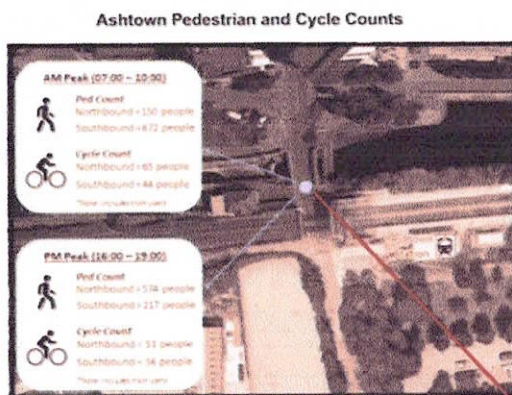
Slides 21-25, [Ashtown Stables - Dart+ West Objection](#)

# DART+ West - Inadequate Pedestrian and Cyclist Assessments

- Ashtown Pedestrian and Cycle Count
- Ashtown Level Crossing Modelling Analysis



## Ashtown Pedestrian and Cyclist Count



- 1 day analysis of pedestrian and cycle counts (5<sup>th</sup> February 2019).
- Insufficient time to gather robust and statistically significant data.
- Irish Rail openly acknowledged that the location chosen for study was inadequate: **"Due to the location where the pedestrian and cycle count was undertaken, it was not possible to determine the number of people using the level crossing that aren't accessing the train station"**.
- Irish Rail did not seek to rectify this shortcoming. Instead of actually carrying out an analysis at a suitable location, they proceeded to make an incorrect assumption: **"Given the surrounding land-use (i.e. no schools or high density employment in close proximity), and the tidal nature of the flows, it is reasonable to assume that the majority of people surveyed are travelling to/from the train station."**

- Weather conditions, major events, buggies / wheelchair counts?



## Ashtown Level Crossing Modelling Analysis

### Irish Rail's Ashtown Level Crossing Southbound (AM) Modelling Analysis



Source: [Maynooth Line Transport Study Final Report](#) (Figure 7.5 Ashtown Level Crossing Modelling Analysis)

- Blue: Key origins of travel with the darker colour representing larger demand levels.
- Green: Key destinations of travel in the AM peak.
- Red: Pedestrian flows if Ashtown crossing is closed. Thicker bands represent larger volumes.

- Irish Rail state that 2027 walk and cycle demand generated by the NTA's multi-modal East Regional Model (ERM), was assigned to the local network and Select Link Analysis was used to identify the number of people travelling via the existing Ashtown level crossing, including their origin and destination of travel.
- This demand was then re-assigned to a network with the Ashtown crossing closed, but with the replacement road infrastructure in place, to identify the impact on travel times and distances.
- Irish Rail presented the results of this analysis for pedestrians travelling southbound in the morning between the hours of 07:00 - 10:00.

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#### Irish Rail's Analysis:

- Most people coming southbound over the Ashtown level crossing walk from Rathborne to Kempton (a housing estate off the Navan Road) or to the Phoenix Park.
- Of those who walk to the Phoenix Park, their destination is Chesterfield Avenue, i.e. the middle of the Phoenix Park.

- **Irish Rail have failed to explain why the majority of people on a weekday morning, during rush hour, would want to walk deep into a neighbouring housing estate or to a road in the middle of the Phoenix Park.**

- There are no schools or modes of public transport in Kempton or the Phoenix Park.

- What do Irish Rail suggest people are walking to these locations for?

- **To anyone with even a remote idea of this area, Irish Rail's analysis is clearly illogical.**

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- In the morning rush hour, rather than walking to the middle of the Phoenix Park, people coming southbound across the level crossing at Ashtown are more likely to be walking to:

- The Navan Road, which is served by a large number of bus routes e.g. 70, 37, 38 and 39.
- Local shops, schools and employers.
- Ashtown train station (both northbound and southbound platforms).

- **Irish Rail's analysis is a complete failure and how it was allowed to enter the public domain must be investigated.**



## Appendix 2

### Bat activity at Ashtown Stables. September-October 2021

Date	Time	Auto Id*	Pulse s	Matching	Manual Id
30/09/2021	19:21:04	Soprano Pipistrelle	45	45	Soprano Pipistrelle
30/09/2021	19:26:59	Soprano Pipistrelle	23	21	Soprano Pipistrelle
30/09/2021	19:27:17	Soprano Pipistrelle	5	5	Soprano Pipistrelle
30/09/2021	19:27:59	Soprano Pipistrelle	42	42	Soprano Pipistrelle
30/09/2021	19:28:19	Soprano Pipistrelle	51	51	Soprano Pipistrelle
30/09/2021	19:31:01	Common Pipistrelle	35	35	Common Pipistrelle
30/09/2021	19:46:24	Leisler's Bat	18	18	Leisler's Bat
30/09/2021	19:50:46	Soprano Pipistrelle	25	23	Soprano Pipistrelle
30/09/2021	19:50:57	Soprano Pipistrelle	31	28	Soprano Pipistrelle
30/09/2021	19:57:44	Leisler's Bat	10	10	Leisler's Bat
30/09/2021	19:57:49	Leisler's Bat	16	16	Leisler's Bat
30/09/2021	19:57:54	Leisler's Bat	16	12	Leisler's Bat
30/09/2021	20:00:12	Leisler's Bat	15	15	Leisler's Bat
30/09/2021	20:00:17	Leisler's Bat	11	11	Leisler's Bat
30/09/2021	20:00:24	Leisler's Bat	7	7	Leisler's Bat
30/09/2021	20:04:48	Leisler's Bat	15	15	Leisler's Bat
30/09/2021	20:04:53	Leisler's Bat	9	9	Leisler's Bat
30/09/2021	20:08:57	Leisler's Bat	3	3	Leisler's Bat
30/09/2021	20:10:29	Leisler's Bat	12	12	Leisler's Bat
30/09/2021	20:10:34	Leisler's Bat	10	10	Leisler's Bat
30/09/2021	20:12:27	Soprano Pipistrelle	33	33	Soprano Pipistrelle
30/09/2021	20:13:13	Common Pipistrelle	30	24	Common Pipistrelle
30/09/2021	20:17:24	Soprano Pipistrelle	3	3	Soprano Pipistrelle
30/09/2021	20:22:43	Soprano Pipistrelle	30	30	Soprano Pipistrelle
30/09/2021	20:25:21	Brown Long-Eared Bat	18	17	Common Pipistrelle
30/09/2021	20:26:15	Brown Long-Eared Bat	12	8	Common Pipistrelle
30/09/2021	20:27:07	Brown Long-Eared Bat	3	3	Common Pipistrelle
30/09/2021	20:28:24	Common Pipistrelle	7	6	Common Pipistrelle
30/09/2021	20:28:54	Common Pipistrelle	8	6	Common Pipistrelle
30/09/2021	20:39:58	Leisler's Bat	8	8	Leisler's Bat
30/09/2021	20:40:03	Leisler's Bat	10	10	Leisler's Bat
30/09/2021	20:47:17	Leisler's Bat	10	10	Leisler's Bat
30/09/2021	20:47:22	Leisler's Bat	9	9	Leisler's Bat
30/09/2021	20:54:22	Soprano Pipistrelle	16	16	Soprano Pipistrelle
30/09/2021	22:08:50	Common Pipistrelle	3	3	Common Pipistrelle
30/09/2021	23:07:28	Common Pipistrelle	3	3	Common Pipistrelle
30/09/2021	23:11:03	Common Pipistrelle	34	28	Common Pipistrelle
30/09/2021	23:11:08	Common Pipistrelle	2	2	Common Pipistrelle
30/09/2021	23:26:39	Common Pipistrelle	14	10	Common Pipistrelle
30/09/2021	23:40:33	Brown Long-Eared Bat	2	2	Common Pipistrelle
30/09/2021	23:46:56	Soprano Pipistrelle	2	2	Soprano Pipistrelle
30/09/2021	23:47:01	Soprano Pipistrelle	6	6	Soprano Pipistrelle
30/09/2021	23:58:35	Common Pipistrelle	3	3	Common Pipistrelle
01/10/2021	01:10:30	Soprano Pipistrelle	6	6	Soprano Pipistrelle
01/10/2021	01:31:12	Leisler's Bat	4	4	Leisler's Bat
01/10/2021	19:32:44	Soprano Pipistrelle	38	37	Soprano Pipistrelle

01/10/2021	19:32:49	Soprano Pipistrelle	10	10	Soprano Pipistrelle
01/10/2021	19:48:12	Soprano Pipistrelle	29	29	Soprano Pipistrelle
01/10/2021	20:05:23	Common Pipistrelle	20	10	Common Pipistrelle
01/10/2021	20:06:45	Leisler's Bat	9	9	Leisler's Bat
01/10/2021	20:06:50	Leisler's Bat	5	5	Leisler's Bat
01/10/2021	20:10:23	Soprano Pipistrelle	35	35	Soprano Pipistrelle
01/10/2021	20:15:54	Common Pipistrelle	19	17	Common Pipistrelle
01/10/2021	20:20:56	Soprano Pipistrelle	18	11	Soprano Pipistrelle
01/10/2021	20:27:20	Soprano Pipistrelle	13	13	Soprano Pipistrelle
01/10/2021	20:28:20	Soprano Pipistrelle	15	15	Soprano Pipistrelle
01/10/2021	21:02:17	Leisler's Bat	8	8	Leisler's Bat
01/10/2021	21:33:07	Brown Long-Eared Bat	4	4	Common Pipistrelle
01/10/2021	21:33:26	Brown Long-Eared Bat	15	9	Common Pipistrelle
01/10/2021	21:33:31	Brown Long-Eared Bat	2	2	Common Pipistrelle
01/10/2021	22:57:24	Soprano Pipistrelle	7	7	Soprano Pipistrelle
02/10/2021	00:17:05	Soprano Pipistrelle	12	12	Soprano Pipistrelle
02/10/2021	02:34:26	Soprano Pipistrelle	21	21	Soprano Pipistrelle
02/10/2021	02:44:17	Soprano Pipistrelle	47	46	Soprano Pipistrelle
02/10/2021	02:44:22	Soprano Pipistrelle	2	2	Soprano Pipistrelle
02/10/2021	03:34:39	Common Pipistrelle	11	11	Common Pipistrelle
02/10/2021	03:47:13	Myonot	3	2	Daubenton's Bat
02/10/2021	04:32:34	Leisler's Bat	2	2	Leisler's Bat
02/10/2021	04:37:30	Soprano Pipistrelle	32	32	Soprano Pipistrelle
02/10/2021	04:37:35	Soprano Pipistrelle	5	5	Soprano Pipistrelle
02/10/2021	04:55:24	Leisler's Bat	9	9	Leisler's Bat
02/10/2021	05:08:27	Soprano Pipistrelle	24	24	Soprano Pipistrelle
02/10/2021	05:27:13	Common Pipistrelle	24	20	Common Pipistrelle
02/10/2021	06:21:05	Leisler's Bat	25	15	Soprano Pipistrelle
02/10/2021	06:41:26	Common Pipistrelle	8	6	Common Pipistrelle
02/10/2021	19:23:09	Soprano Pipistrelle	43	41	Soprano Pipistrelle
02/10/2021	19:23:14	Soprano Pipistrelle	8	8	Soprano Pipistrelle
02/10/2021	19:32:28	Soprano Pipistrelle	35	35	Soprano Pipistrelle
02/10/2021	19:32:33	Soprano Pipistrelle	10	10	Soprano Pipistrelle
02/10/2021	19:40:43	Soprano Pipistrelle	27	27	Soprano Pipistrelle
02/10/2021	19:43:17	Common Pipistrelle	53	53	Common Pipistrelle
02/10/2021	19:43:22	Common Pipistrelle	5	5	Common Pipistrelle
02/10/2021	20:02:31	Soprano Pipistrelle	35	35	Soprano Pipistrelle
02/10/2021	20:02:36	Soprano Pipistrelle	7	7	Soprano Pipistrelle
02/10/2021	20:07:52	Soprano Pipistrelle	4	4	Soprano Pipistrelle
02/10/2021	20:17:46	Soprano Pipistrelle	24	24	Soprano Pipistrelle
02/10/2021	20:29:05	Leisler's Bat	3	3	Leisler's Bat
02/10/2021	20:31:12	Soprano Pipistrelle	32	32	Soprano Pipistrelle
02/10/2021	20:31:17	Soprano Pipistrelle	5	5	Soprano Pipistrelle
03/10/2021	00:13:34	Daubenton's Bat	11	5	Daubenton's Bat
03/10/2021	01:05:34	Soprano Pipistrelle	26	26	Soprano Pipistrelle
03/10/2021	19:29:52	Common Pipistrelle	9	6	Common Pipistrelle
03/10/2021	19:39:11	Leisler's Bat	5	5	Leisler's Bat
03/10/2021	19:41:49	Soprano Pipistrelle	30	30	Soprano Pipistrelle
03/10/2021	20:00:06	Soprano Pipistrelle	40	40	Soprano Pipistrelle
03/10/2021	20:00:11	Soprano Pipistrelle	5	5	Soprano Pipistrelle
03/10/2021	20:13:47	Soprano Pipistrelle	11	10	Soprano Pipistrelle
03/10/2021	20:21:43	Leisler's Bat	4	4	Leisler's Bat
03/10/2021	20:22:35	Leisler's Bat	13	13	Leisler's Bat
03/10/2021	20:22:40	Leisler's Bat	16	16	Leisler's Bat
03/10/2021	20:28:32	Soprano Pipistrelle	22	22	Soprano Pipistrelle
03/10/2021	21:00:12	Myonot	5	2	Daubenton's Bat
03/10/2021	23:05:03	Common Pipistrelle	6	5	Common Pipistrelle



03/10/2021	23:30:37	Common Pipistrelle	2	2	Common Pipistrelle
04/10/2021	05:57:09	Brown Long-Eared Bat	2	2	Common Pipistrelle