

An Bord Pleanála,
64 Marlborough Street,
Dublin 1, D01V902

Development: "DART+ West Electrified Railway Order 2022".

Ref: 14. Railway Order - Sheet 14 (12.0 – 13.0km)

- 14.1 Decommissioning, demolition, and site clearance of the existing level crossing on the Porterstown Road. Remove existing level crossing infrastructure and provide secure gated access for Irish Rail at the existing level crossing (WP014).
- 14.2 Provide a new pedestrian bridge to the east of the closed Porterstown Road level crossing over the railway and Royal Canal with new pedestrian and cycle facilities provided.
- 14.3 Provision of new turning facilities at the closed level crossing along with access into properties north and south of the existing level crossing on Porterstown Road (WP014)

Location: On site at Porterstown Road, Porterstown, Clonsilla, Dublin 15, D15 Y95T

Applicant: Iarnród Éireann.

Community Liaison Officer, DART+ West, Iarnród Éireann, Inchicore Works, Inchicore Parade
Dublin 8, D08K6Y3
DARTWest@irishrail.ie (01) 8235127

Observation by: Desmond Brown & Anna Keane Glen Garbh, Porterstown Road, Clonsilla, Dublin 15. [REDACTED]

OBSERVATION

Dear Sir/Madam,

I am familiar with the documents lodged in the DART+ West Railway Order Application. For reading purpose, the Rail order text is in black below and my observations are in blue font.

The planning proposal hereby lodged under a draft rail order raises serious Planning and Development issues which technically exceed the stated objectives and policies of the current Fingal County Development Plan under which Iarnród Éireann are asking to be reviewed and would appear to include potential compulsory orders of private lands and rights of ways of access over lands which is of major concern. I hereby object to the proposed type of foot / cycle bridge at Keenan Bridge which would create a dangerous precedent in terms of its elevation, density / height, bulk and massing of the built format– including exceeding site coverage and plot ratio conventions for the future.

New Pedestrian Foot & Cycle Bridge

Height Scale & Mass

The proposed height, scale and mass of the footbridge is wildly at variance with the established density and pattern of development in this area, being predominantly two and single storey semi-detached houses serving families with children in a rural setting and "green amenity" along the Royal. There has been no notable socio economic or Zoning changes to the established settlement criteria in this locality except immigration of people based on alien Market forces, Clearly an economic migration.

The proposed dense format in every respect cannot rise to the reasonable development standards set out in the Fingal Co Development Plan. The proposal submitted is therefore an unwelcome Urban solution in concept that will neither protect the environment or existing residential footprint based on these lands as duly zoned. No effort is made to comply with the "Urban Development and Building Height Guidelines 2018". In addition the design of the pedestrian footpath/cycle bridge fails to meet any standards in addressing environmental concerns or blending-in with the natural environment and rural setting. The visual appearance of the footpath and bridge would appear to drastically alter the landscape and skyline along the Canal and dominate the natural and rural setting rather than enhance it.

In considering the height criteria for this development, the planning authority are obliged to compare the internal and external ROAD network serving the development under Section 28 DMURS standards.

A cursory glance at this order proves that highly proposed elevated housing, buildings including bridges is plainly unjustifiable and for yet intended further potential dense/higher residential development. The Clonsilla Urban Centre Strategy for example, proposes that the lands in front of the Old School site should be reserved as single/two storey due to it being in an environment of existing cluster of Protected Structures to the South, North, East and West of proposed bridge development.

The Clonsilla Urban Centre Strategy has been upheld by Fingal County Council in refusing permission for high-rise apartment block develop on the Old School house grounds. A similar application is pending with ABP for similar development on the site directly opposite and east of the Old School house, again strongly objected too by residents of Porterstown Road and Clonsilla village, Fingal County Council in relation to application from an entity - Bartra Porterstown Development. The public are aware of the current matters being investigated by the DPP as recently directed by the Minister of Planning Darragh O'Brien into matters that involve lack of transparency and democratic process in granting of planning permissions within the Irish State. There are numerous other cases, the nearby ALDI site due to the retail details and density that was proposed. The Clonsilla Urban Centre Strategy should be taken into account in this case regarding height standards in addition to the existing local height precedent and preference for residential development as two (2) storeys in height.

Residents have noted deliberate attempts by successive Government in delivering a failed and flawed Government housing strategy and set of policies that are investor-led, build to rent for profiteering purposes only with disregard to the issues of an inflated housing market, virtually no development of proper buy-to-own or rent-to-own homes for citizens of the state including Irish nationals. We ask why property owned by the state under NAMA has not be released to house our own Irish nationals and immigrants who come to work, live and support national economy alongside their Irish counterparts as Europeans. We ask Government, why a Globalist view is permitted to take precedent over our national and European interests at the expense of working class people who are the backbone of the Irish and European state. While these issues are political and not the subject of planning nor this observation, they nonetheless shape the very planning strategy and policies that are not about preserving our environment, building of affordable housing or sustaining communities and protection of the environment but rather are intended to serve the interests of property speculators/investors and developers rather the needs of citizens and providing of family homes.

The Windmill 8 storey SHD located to the East of Troy Bridge outside the Clonsilla boundary, is an example of the type of impact of such development that we do not wish to see repeated. The Windmill developments (outside the Clonsilla area boundary) sets a dangerous precedent for the kind of development of Clonsilla village that is based on speculative/investor and developer led building for Social Housing Development and contravenes the Clonsilla Development plan.

PROPOSED RAILWAY ORDER

4.7.1.6 Porterstown Level Crossing (XG008)

This section characterises Porterstown level crossing (XG008), it presents some of the key constraints and considerations in the design development. Porterstown level crossing is located on the Old Porterstown Road.

The level crossing is currently CCTV controlled. Porterstown Road connects Clonsilla Road to the north to Diswellstown Road to the south. The crossing is located immediately adjacent to the Royal Canal, which is spanned by Keenan Bridge a masonry arch protected bridge (RPS) structure. The Dublin to Sligo railway line runs east west at this location, and the level crossing is located on a straight section of railway. The main planning policy provisions, zoning objectives and specific objectives relevant to the area are contained in Fingal Development Plan 2017-2023 specifically in the Blanchardstown south Sheet No. 13. The lands in the vicinity of the level crossing are zoned RS (residential) and OS (open space and recreational amenities).

We would urge An Bord Pleanála to seriously consider all aspects in relation to development including impact to existing residential development and footprint. We believe there needs to be a limit to development in open spaces and amenity areas in order to preserve open space areas along the Royal canal by limiting any form the development that does not retain the existing footprint in terms of height, mass and density of building and infrastructure construction.

We also call on the Fingal County Council and Waterways Ireland to effectively collaborate on matters of “sensitive design”, preservation and protection of the environment and fringe spaces along the Royal Canal, protection of the ecological and biodiversity aspect, natural and rural characteristics of the environment and sensitive planning. Furthermore, there needs to be greater cooperation and integration public service authorities in prevention and management of public dumping, littering and management of negative impacts of planning close to in open, green and amenity spaces in areas of waste management, public littering, dumping, and addressing anti-social behaviour in these areas and within communities which are frequently experienced by local residents and citizens who are respecting in use and enjoyment of amenity and retaining the rural setting in these areas along the Royal Canal.

Such matters have been seriously neglected and or even omitted in planning strategy, policies and development proposals which has led to unfavourable and problematic outcomes as a result and are the root cause of a spate of current issues related to over-building, densification and concentration of housing development due to increased population in the greater Dublin 15 area. Without adequate upgrades of infrastructure, increase in emergency services, resourcing of policing and mindful of safety and security of residents living close to amenity areas give rise to the negative aspects and public image and usage of development.

Figure-1



The proposed runway style ramp (Figure-1) & Figure-2 given its height, mass and length towers well over adjacent homes in this immediate vicinity of Kennan Bridge North and South of the railway line. The proposed ramp is 7m above road level at its highest point and 6m above ground level in front of the Old School house overlooking residential home immediately north (5m in height) and would visually alter the southerly horizon of this property and homes (Village Estate) immediately opposite and north of this construct.



This property to the East – the 3 story Courtyard apartment development is completed overlooked as a result of the Windmill mass block (towering) development that overlooks all previous residential homes within the Clonsilla boundary to the West of the this development.

There was absolutely no consideration given to existing residents, residential building heights or to the extent and impact of overlook and infringement of existing residential privacy and security of homes given the mass and height of actual development. Windmill has visually altered and destroyed the skyline permanently, ignoring the existing as a consequence of insensitive design and unwanted investor-developer led planning of soviet (block style) build for rent housing for profiteering only purposes. The artists impression does not convent the daily – fast food littering, drink bottles, cans and at this location.

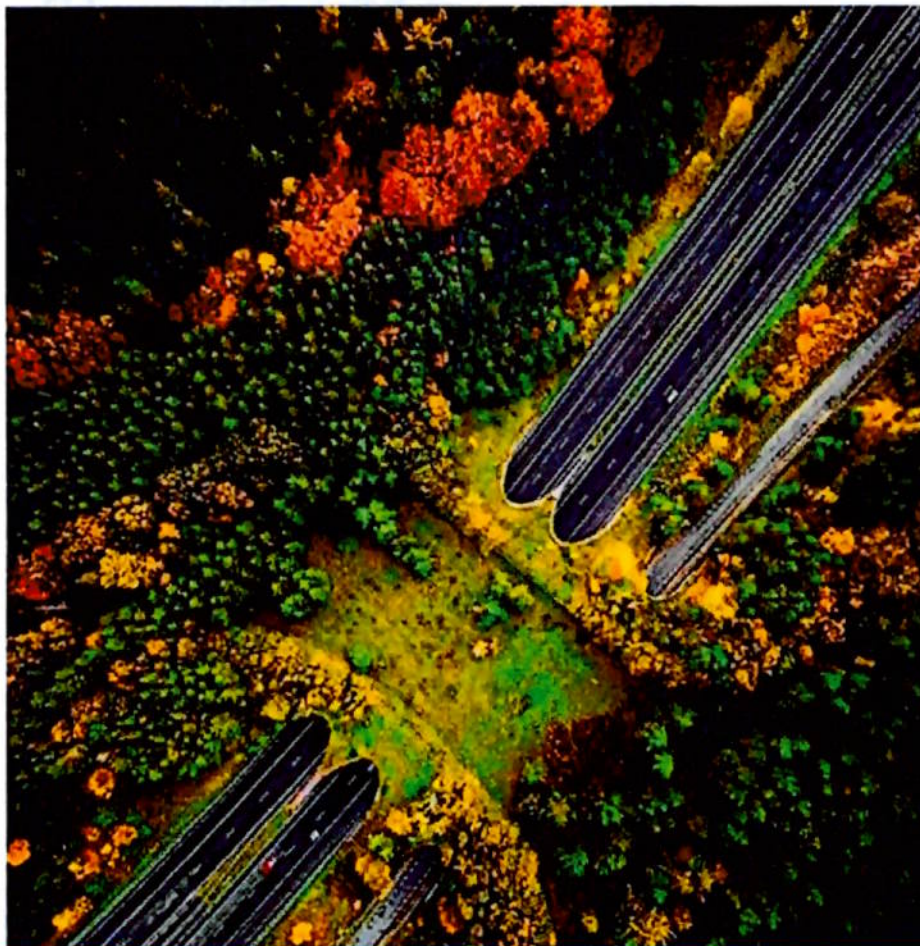
The design principles used by our Dutch Counterparts as planners in the Netherlands ought to be considered as a preferred alternative in approach to planning that is far more environmentally friendly and considerate in retention of natural environment and landscape by significantly reducing and practically eliminating mass building obtrusive concrete structures domineering over the natural landscape. As residents, we ask - What other design alternatives were considered with the proposal if any? What design criterion was used and in respect and assessment of visual impact? Did the criterion include protection for the natural environment (visually) as amenity?

This aspect would seem to have been completely ignored. How many other design concepts were sought in relation to such footbridge/cycle passages over a canal & rail line ? Which building contractor and/or "designers" were responsible for the proposed design of the cycle and footbridge as outlined in the draft rail order? How is this project being funded?

Is it not prudent to defer development of such projects until further thought has been given to these aspects rather than waste funds on appalling structures at this very time given many people are unable to buy/rent a home and presently able to heat their home in the uncertain Geo-Political and economic climate? Who makes the final decision?

Figure-4 – Example of Exceptional and Outstanding Design in preservation and maintenance of Natural Landscape, road/motorway and rail connection.

A wildlife crossing in the Veluwe, The Netherlands



Residential Safety & Security in proximity to Foot and Cycle bridges. The type of materials used ought to be resilient to vandalism and blend with the environment. In terms of sustainability, the development needs to contain materials that is be resilient to intentional vandalism, malicious damage, (graffiti), disfigurement and other malicious illegal acts of destruction to public property which is an inevitable occurrence in our modern society and the times we live in. Even with sensitive designs, there needs to be camera monitoring, policing and rigorous law enforcement to curb vandalism with heavy penalties to ensure public amenities themselves are respected and protected for the benefit of everyone especially since the tax payer pays for them. What we frequently experience are designs of construction that encourage and invite anti-social disorder impacting on residential areas, buildings, structures that degrade the environment even further by offenders in such communities who have no regard for preserving the environment that ultimately lead to its degradation and destruction without impunity and pose a threat to the safety, security and basic right to live as law abiding citizens respectful and caring of their environment and who work and pay taxes as responsible citizens for the good of residential areas and community.

In cases of high elevated overpass bridges in the country, there are many reported instances of stones, mud and rocks thrown onto cars passing underneath, shattering windscreens on several nights as reported in the media and in the public domain. Dublin's worst Dart stations highlight the levels of anti-social behaviour and revealed drink (Alcohol) and drugs as the top plague on trams which proves that these are serious matters that need to be seriously considered and that are associated with rail infrastructure projects, at train stations, and throughout the infrastructure including under and overpasses as well as on the trains themselves. Much anti-social behaviour, stems from public drinking, drugs leading onto more serious crime offenses. Keenan bridge was the subject of a tragic death of a young female as a result of late night social gatherings at this very location in recent years.

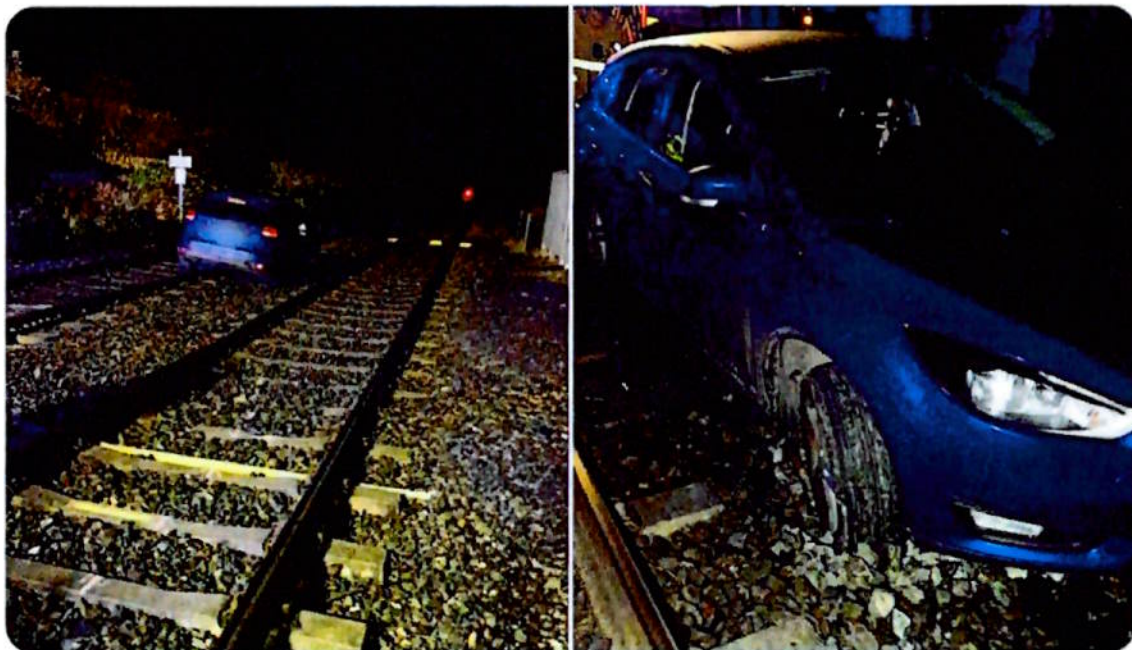
Given the extent of development in the greater Dublin 15 areas adjacent to Porterstown Road (a rural country road passing over the canal into Clonsilla village, there has been exponential increase and concentration in motor and pedestrian traffic that increased littering, dumping along the Porterstown Road and within the fringe spaces along the Royal canal route. We do not see any joint collaboration between Iarnród Éireann, Fingal County Council and Waterways Ireland in collaborating creating and producing innovative design that addresses all of these issues that arise as a result of planning. A siloed and "hotch-potch" approach appears to be adopted with no real serious intent or consideration of end user, local community and existing residents co-creating an outcome that meets the needs of the environmental, preservation of the rural and amenity aspect, and protects local residential and holds to account public uses. Furthermore, local residents have experienced an increase in Anti-social behaviour that comes with over densification and /or spill over from over-development in adjacent areas that now need additional police resourcing, better response times and follow up, monitoring and law enforcement as realistic measures in controlling and effectively dealing with impacts of anti-social behaviour on the environment and on residential area. Sustainability needs to wider issues a range of factors that are relevant to the very notion of "sustainable community".

A recent incident involving the driving of a car down the rail track at Porterstown earlier this year highlights the type of behaviour's that are experienced more frequently locally and nationwide (Figure 5) below. Dublin firefighters from Blanchardstown and Phibsborough worked with Irish Rail after a car had got onto the train line at Porterstown highlights a growing trend in this particular area at Porterstown/Clonsilla village at Keenan Bridge. While residents encourage and support use of open space and recreational amenities there is a wider growing concern for residential safety and security as a result of densification and lack of provision and rapid response when incidents are reported.

In an even more recent incident – a resident was threatened on his property when he called and reported illegal parking blocking his entrance to his home to the police. Due to inadequate provision of parking at recreational places and attending a football match's in the adjoining St. Mochtas Football ground field all give rise to blocking of residential access.

Nearly 2,300 incidents of antisocial behaviour were logged by Irish Rail last year. Over 760 incidents involving anti-social behaviour on rail network reported in first six months of this year. These types of bridge designs are typically defaced by graffiti (as is the case on Troy Bridge) and many concrete and steel structures across the entire country – turning areas where such structures are located and which now look like Ghetto areas and visual degradation of a once natural environment and particularly where such structures lend themselves to areas of public misuse and abuse. Dublin 15 has one of the highest crime rates in the country. In Dublin along, there has been a growth in violent anti-social behaviour on our streets in recent months, and here in Dublin it is very clear to see. We are hearing near-weekly reports of random attacks on individuals – including hate-motivated assaults – as well as organised fights between gangs of thugs.

Figure 5.



The existing road over Keenan Bridge (RPS no. 698) is only wide enough for a single lane of traffic meaning one vehicle must give way to an opposing vehicle on the approach to the bridge. The need for a full road traffic connection on Porterstown Road has been largely replaced by the recent construction of the Porterstown Viaduct located 200 metres to the east. Developments in recent years have provided connection being secured to the Porterstown Distributor Road running east west along the northern boundary of Luttrellstown Castle Estate.

Fingal County Council has recently identified a preferred route with the proposed Kellystown Road Improvement scheme which proposes to construct a new link running east west and tying into the Diswellstown Road as part of the Kellystown Local Area Plan. This link will bypass the Old Porterstown Road and any residual use of the road will be for local traffic only.

We welcome and are in support of such a proposal to alleviate traffic off Porterstown Road. The current problems and issues of access and permeability is as a direct result of previous over planning and densification without the proper transport infrastructures, proper controls in monitoring and prosecuting social disorder offenses and transport / road, cycle upgrades in parallel with residential development. The advocacy of a vision that suggests everyone will be working from home or in one part of the city is overly simplistic and totally unrealistic. Many people have occupations or the need to use motor car and public transport to travel in/out of Dublin city and other such cities/towns across the country not just for working but in all areas of social living. Restriction traffic and /or prohibiting of motor traffic from cities/towns where there is rail connectors requires significant capacities in car-parking facilities to get to and from connection points – which often more than not involved parking and traffic congestion where these points are within residential areas or areas of amenity.

The increase of Motor Traffic on Porterstown road in recent years has been as a result of under-capacity and sizing of the Viaduct due to developer led speculative planning without ensuring adequate provision of infrastructure/upgrades and services were put in place in parallel. This is a constant problem inherent within the planning process and system that is replicated nationwide.

The existing level crossing is accessed via the narrow Keenan Bridge (RPS no. 698), a canal bridge that allows only one direction of travel at a time. Keeper's Cottage is also located on the Porterstown Road (RPS No. 699) and is a mid-19th century Rail Keeper's Cottage located on the southern side of the level crossing. The canal is in a relatively deep cutting at this point. A ringfort (RMP DU017-005) is situated in Porterstown townland 600 m to the south of the level crossing. We are calling on Fingal County Council to protect the cottage opposite the old school house (old Keane cottage) as a PS given its circa 1840's construction and association with a number of PS's in this concentrated area and opposite the old school house in a cluster of such structures along with the Keeper's cottage. We have been given assurances from local County Councillors and the heritage section of Fingal County Council that this cottage is to be retained given its historical context that are of both local and national heritage dating back to pre and post famine times. Furthermore, the total closing of Porterstown Road Rail crossing would limited local residential access off Porterstown Road onto Clonsilla road which is currently problematic due to traffic congestion at the junction and Clonsilla N.S at peak school drop off-times.

We would suggest that consideration is given to the Keenan Bridge Rail crossing and opened at off-peak train times especially during recreational usage / football game times etc. The traffic needs to be diverted and taken out of Clonsilla village and an alternative motor school drop off / collection point established away from the Porterstown Road/Clonsilla Road junction. The current congestion is as a result of over-sight in previous planning – positioning of two major schools within short distance of each other without adequate access capacity planning and provision giving rise to the problems today as direct cause and over burden on services as a result of increased population and immigration.

The area surrounding the level crossing is predominantly green field sites, with some low-density residential development to the north of the crossing. There are two sports facilities on the eastern side of Porterstown Road – one on either side of the canal / railway corridor and there are also two schools along the road. This particular fringe space along the Royal Canal has a rich biodiversity and ecological habitat. The construction of high-rise building and elevated monolithic structures would severely detract from the natural amenity and skyline and rural setting of these spaces.

We are opposed to any such development that alters the amenity and rural aspect of this location which needs to be preserved. We request that any development of the Old School house and opposite lands are within the existing footprint of development designated in the Clonsilla village and Porterstown area of development to prevent over development of high-rise overlook overshadowing and visually terrible development such as the Windmill development east of Troy Bridge that has drastically altered the skyline and destroyed the natural landscape to the east of the Clonsilla Village Boundary. Step 1: Discovery/Identification of Visual Resources ought to consider as essential start of the process is to conduct a Visual and Aesthetic Resource Evaluation that includes a field review to identify and inventory the visual elements associated with (1) viewers from and to the roadway area, (2) the setting of the project, and (3) elements of the project that will result in dominant radical changes to the setting.

Open space, recreational and amenity land uses are present and include the Royal Canal Way. Extensive tracts of existing agricultural land is earmarked for future development associated with the Kellystown LAP area – refer to Figure 4-28 below identified as map based objective 'LAP 13.C'. This figure also identifies the current land use zoning in the vicinity of the level crossing.

Figure 4-28 Blanchardstown South - Land use zoning objectives (Source: Fingal Development Plan 2017 – 2023, Extracted from Sheet No. 13)

- Specific Objective 137: "Preserve the existing pedestrian and vehicular right of way at the level crossing at Porterstown".
- RPS No. 698: Kennan Bridge: A late 18th century single-arched stone road bridge over the Royal Canal.
- RPS No. 699: Rail Keeper's Cottage (mid-19th century).
- Royal Canal (RPS No. 944a) & pNHA.
- MP 13.B Old School House Masterplan (Porterstown).

The proposed development is broadly consistent with the policies and objectives of FCDP and support existing and future growth and sustainable mobility and transport trends.

4.7.1.6.1 Kellystown Local Area Plan 2021.

The Kellystown LAP was approved by Fingal County Council in January 2021 and is relevant to the Clonsilla and Porterstown level crossings. The LAP lands are bound by the Royal Canal to the north and the Dublin-Maynooth Railway Line to the south, Diswellstown Road to the east and Clonsilla Road (R121) to the west.

The lands comprise approximately 56.4 ha. The LAP will provide a statutory framework for the proper planning and sustainable development of the area. What do we mean by sustainable development? The concept of sustainable development has been criticized from different angles. While some see it as paradoxical (or an oxymoron) and regard development as inherently unsustainable, others are disappointed in the lack of progress that has been achieved so far. Part of the problem is that "development" itself is not consistently defined.

The sustainable development debate is based on the assumption that societies need to manage three types of capital (economic, social, and natural), which may be non-substitutable and whose consumption might be irreversible.[35] Natural capital can not necessarily be substituted by economic capital. While it is possible that we can find ways to replace some natural resources, it is much less likely that they will ever be able to replace ecosystem services, such as the protection provided by the ozone layer, or the climate stabilizing function of the Amazonian forest.

The LAP refers to the DART+ West proposals and recognises the intention to close Clonsilla and Porterstown level crossings. The LAP states "With respect to Development Plan Objective 137 (To preserve the existing vehicular right of way at Old Porterstown Road level crossing), the findings of the Maynooth Line Transport Study report have concluded that there is no need to retain a vehicular right of way at this location. The Kellystown Draft LAP continues to support Objective 137 of the Fingal Development Plan."

The LAP supports the DART+ West project and investment in sustainable public transport, active travel, high quality sustainable urban developments and increased levels of pedestrian and cyclist movement within and around the area that will be supported by the project. Figure 4-30 below indicates the internal and external links which the project supports.

Figure 4-29 Kellystown LAP Indicative Layout Plan (Source: Kellystown LAP 2021)

The LAP refers to the DART+ West proposals and recognises the intention to close Clonsilla and Porterstown level crossings. The LAP states "With respect to Development Plan Objective 137 (To preserve the existing vehicular right of way at Old Porterstown Road level crossing), the findings of the Maynooth Line Transport Study report have concluded that there is no need to retain a vehicular right of way at this location.

The Kellystown Draft LAP continues to support Objective 137 of the Fingal Development Plan.” The LAP supports the DART+ West project and investment in sustainable public transport, active travel, high quality sustainable urban developments and increased levels of pedestrian and cyclist movement within and around the area that will be supported by the project. Figure 4-30 below indicates the internal and external links which the project supports.

The above objectives are high level and would require further definition in detail to assess and evaluate. We would ask - What are the working assumptions? Why is it assumed that everyone would be walking and cycling to their places of living, working and confined to central locations? Is there any evidence to suggest that this would be a better reality even if realised? What are the prevailing and fluctuating socio economic factors and conditions of the future plan based on? What if those factors were not to emerge in reality? What else has not been considered? On what basis are such predictions and future forecasts made? What if the actual conditions are different to those understood presently in the current climate? How do we interpret the word “sustainable” and whose interpretation is agreed as standard? We do not have a rail link to Dublin Airport from any part of the city? Why would this rail link not be of a higher priority than the Kellystown LAP development? How are natural green and open spaces to be protected environmentally from over-development and protected from dominant structures - houses and buildings in considering various building designs and prioritizing protection of “natural” environment over unnatural development? What consideration has been given to blend development within the natural environment rather than the other way around where development dominates, erodes and ultimately destroys natural environment? In all reality, it is highly probable that use of motorized transport (cars) will still be needed in all areas due to the nature and activities of people and movement based on their various human activities in living, working and having access to recreational natural pursuits.

Figure 4-30 Walking and Cycling Network (Source: Kellystown LAP 2021, FCC)

The general guiding principles for the development of lands within the Kellystown LAP include, but are not limited to the following:

Objective 6.2 “Provide high quality housing having regard to the Planning Guidelines on Sustainable Residential Development in Urban Areas, the Fingal Development Plan development standards and the design principles as set out in this LAP”.

Objective 6.4 “Provide high quality development at appropriate densities in close proximity to Clonsilla Rail Station in order to maximise the benefits of investment in rail infrastructure”.

Objective 6.12 “Align pedestrian and cycle links to capture views to local features (natural and built) and incorporate opportunities for overlooking and passive surveillance insofar as possible”.

Objective 6.13 “Create safe and attractive pedestrian and cycle routes with high levels of legibility and permeability connecting the lands to local amenities and the adjoining areas of Clonsilla and Carpenterstown”. Kellystown LAP has the capacity to accommodate for approx. 1,055 – 1,583 additional residential units within three ‘Development Areas’ as shown in Figure

4-31 with the phasing of development to progress generally in an east-to-west manner from Porterstown Road in the east of the LAP towards the R121 in the west.

Old School House Masterplan

Fingal County DP 2017-2023 has zoned lands to the north of the Royal Canal to be developed as part of the future Old School House Masterplan (Figure 4-32). At the time of writing Fingal County Council are in the process of preparing a Masterplan for Old School House, a protected structure.

Residents in Clonsilla and Porerstown have consistently made our views known to our County Councillors in Fingal (those who represent our concerns and listen to our views and needs) as being opposed to the types of proposed development (made known in our previous planning observations and objections) against a spate of investor led/developer proposals submitted to develop Clonsilla village and the fringe spaces along the Canal including the site of the old school house and lands to the east as high-rise high density soviet bloc development (all of which fall outside the existing residential footprint of 1-2 story development. Residents are strongly opposed to this type of speculative mass block development given excessive height, mass and density of such developments which would overshadow and destroy the rural and natural landscape along the Canal as amenity. Furthermore, any form of high-rise, high density development on the the Old-School House site and lands to the east and west of this site would set a dangerous precedent for this style of development – and completely destroy the natural character of the Royal Canal with which has protected wildlife and rich biodiversity. The natural character of the Canal should be retained along with protected structures of local and national heritage including the old Keane Cottage directly east of the old school-house dating back to early 1800's.

At the entrance to the old school house and directly opposite is the entrance to our family homes. We note that there it is proposed to remove the entrance gate and install a turn-about immediately at the entrance to our home and property. We are opposed to this proposal and any removal of the gateway which poses a high safety and security risk. The access lane has been maintained by the family for over 100 years and provides the only means of access to a residential property is landlocked to the East by the Diswellstown overpass (Troy Bridge), to the North by the Courtyard development, to the South by the Royal Canal and the access forms the only means of access to a family home. The entrance land was created at the time of construction of the Royal Canal and contains (locally referred to as "Skang" lands from excavations and throw up of soil and rock that run East West along our site and the Old School house in the construction of the Royal Canal. We would request that the security and privacy of this access is retained and protected as fringe space and is not interfered with in planning and development . A Declaration of access was granted on its private usage and the access has been maintained by family in occupation over the last 100 years.

Figure 4-32 Lands designated to be development under the Old School House Masterplan (MP13.B). Source: Fingal Development Plan 2017-2023

The lands within the Masterplan are designed as 'RA – Residential Area' to "Provide for new residential communities subject to the provision of the necessary social and physical infrastructure". The following key objectives have been identified within the Development Plan for the Masterplan:

- Development provided for within the Masterplan lands shall be to secure the preservation, conservation and redevelopment of the Old School House, a Protected Structure. Any new development will respect the integrity of the Protected Structure to be retained. In regard to the above, we believe the site should be restricted to development within the existing residential 1-2 story footprint and not development of high-rise, high density development. The Porterstown Road does not have the capacity for addition loading of traffic in/out of the entrance to Old-school house and/OR lands to the East. Any residential development would need to conform with existing 1-2 story development similar to "The village Estate" directly opposite and immediately North of the Old School house site. It has always been suggested that the Old-School house be retained as a tourist attraction, with café/arts/crafts and retained as a cultural /heritage centre given the history of the deep sinking and loss of life on the Canal in the 19th Century.
- No residential or commercial unit shall be sold or occupied pending the full reinstatement of the Protected Structure to the satisfaction of the Planning Authority. This is welcomed and we would request the old Keane Cortège directly opposite is listed and retained as a PS – as has been required via the Fingal County Council heritage section of which residents have been in contact.
- Preserve the Old School House, a Protected Structure, and facilitate its rehabilitation into a suitable long-term use that is integrated with the back lands adjacent to the Royal Canal and which provides public access, and links to the Royal Canal as a central design feature.
- Facilitate a comprehensive re-development of this backland area which provides new pedestrian and cycle route connections to adjoining sites. The meaning of comprehensive re-development is vague. Residents are opposed to high-rise, high density development in fringe spaces along the canal. Provide for integration with the Royal Canal and with adjoining Open Space lands. Again the use of language is open to misinterpretation and vague in its meaning. Any proposed development would need to be limited in height, scale, mass and density in order to preserve the existing residential footprint and retain the rural and natural setting and characteristic of the Royal canal. The proposed bridge in our view and in its current format and design detracts from the natural feature and setting of the canal.
- Provide for a recreational/tourism hub at this location facilitating a linear public park in addition to tourism related uses, restaurants and craft shops to be scaled and designed in a sensitive manner to reflect the sensitive environment. This would seem reasonable and would be supported. The dereliction of the old-school house site is problematic and development along the above lines would believe receive local community support.
- A key priority of the Masterplan shall be safeguarding the viability of the schoolhouse restoration (financially and otherwise). I agree along with my neighbours and residents.

The proposed development will support the land use objectives of the Old School House Masterplan by maintaining pedestrian and cyclist access at the existing Porterstown level crossing via the proposed cyclist and pedestrian bridge. Vehicular traffic will be redirected to Porterstown Viaduct which will provide direct access into the lands to be developed as part of the Masterplan. The proposed cyclist and pedestrian bridge is of a computerized design that is visually obtrusive and overbears down on the existing residential footprint in this rural space. It's very design detracts from the "natural environment" and could only be described as "Ugly" and of low quality design. This is appalling planning and adverse to protecting the natural beauty, trees and skyline along the Royal Canal by embedding elevated structures and mass concrete pillars into the landscape. We would urge ABP to refuse this proposal given its obscurity lack of originality, creativity, preservation of the natural / rural landscape and blending of proposed development into the natural environment. The proposed bridge is considered an overbearing feature that dominates the rural and natural setting at these locations – dreadful stuff.

4.7.1.6.2 Closure of Porterstown Level Crossing

Objective 137 of Fingal County DP 2017-2023 aims to "Preserve the existing pedestrian and vehicular right of way at the level crossing at Porterstown". While the proposed development will permanently close the 'existing' level crossing, alternative pedestrian and cyclist infrastructure will be provided at this location enhancing the pedestrian and cyclist facilities in the area. The delivery of the DART+ Programme capacity enhancement cannot be achieved if the level crossing remains open. F CC through the Kellystown LAP recognise the plans for the close the level crossings by IÉ to facilitate the roll out of the DART+ Programme. The project supports the LAP by providing safer and improved walking and cycling infrastructure at the level crossing. Given the restricted access due to over development in adjacent areas to Clonsilla village and into the surrounding areas where it is suggested that even further development of adjacent areas such as Kellystown is to be established would suggest that traffic levels and congestion is highly likely to increase and become even more problematic that is currently experienced by residents. The singular access out onto Clonsilla Road off Porterstown Road (is already unfit for current purposes and uses – with regular footpath parking, two major schools within a short distance and the positioning of Clonsilla NS at junction of Porterstown – Clonsilla Road on the Northern end, in addition to two large soccer (St. Mochtas) playing fields will further limit residential access in/out and off Porterstown road. We would highly suggest that Porterstown Road is confined for residential access only and that parking facilities need to be address. Furthermore traffic congestion and school drop off points are would need to be re-positioned or moved away off Porterstown Road with closure of the rail crossing at Peak Traffic rail times and local access for residential access only retained as being available – at off rail peak times.

Vehicular traffic will be redirected to the existing road network, including the Porterstown Viaduct which will also facilitate direct access to lands to be developed as part of Kellystown LAP (via future Kellystown Road) and the Old School House Masterplan.

The proposed development supports active modes of travel and sustainable transport by prioritising and maintaining the pedestrian and cyclist access at the existing Porterstown level crossing and improving rail services and capacity which will also work support climate change targets by supporting active modes of travel. The proposed development facilitates the realisation of Objective 6.13 of the LAP "Create safe and attractive pedestrian and cycle routes with high levels of legibility and permeability connecting the lands to local amenities and the adjoining areas of Clonsilla and Carpenterstown". The provision of active modes of travel and sustainable transport need to consider the visual impact of construction and how these later/detract and take away from the natural environment so that more imaginative and sensitive forms of design are fully considered. We object to the scale, mass and elevated heights proposed by the cycle / pedestrian pathway proposal at Keenan bridge which would visually overshadow and bear down on the existing residential footprint along the fringe areas of the Royal canal and in the immediate area. High rise builds and construction alters the space and skyline which are a feature of the environment. We strongly object to the proposed elevation, height and mass format of foot/cycle bridge which needs to be at ground level so as not to impact on the natural skyline or overlook texting one-two-story residential homes and keep within the existing footprint in the area.

Vehicular traffic will be redirected to the existing road network, including the Porterstown Viaduct which will also facilitate direct access to lands to be developed as part of Kellystown LAP (via future Kellystown Road) and the Old School House Masterplan.

The proposed development supports active modes of travel and sustainable transport by prioritising and maintaining the pedestrian and cyclist access at the existing Porterstown level crossing and improving rail services and capacity which will also work support climate change targets by supporting active modes of travel.

The proposed development facilitates the realisation of Objective 6.13 of the LAP "Create safe and attractive pedestrian and cycle routes with high levels of legibility and permeability connecting the lands to local amenities and the adjoining areas of Clonsilla and Carpenterstown". We would ask In what way is the proposed development considered visually attractive given its excessive height and scare? Visually, the current proposal is environmentally unfriendly and visually out of character with the existing natural environment. What standards of design were used to determine "attractive" and "quality" of such a proposal? Has the proposal been accepted by environmentalists and preservation groups within community who are frequent public users of the canal walkway?

The proposed bridge design does not blend within the natural environment in any shape or form if one looks at it objectively. It is extremely alarming that professional planning and planners would even propose this type of elevated footpath crossing and bridge which is not original, creative or environmentally conducive to "naturalism" in the environmental sense nor sensitive in blending in with the existing natural characteristics of this rural space. Neither are such overpasses considered suitable in meeting the needs of disabled persons. It can be argued the proposed design positively discriminates against disabled members of communities and to access by wheel-chair and navigate all the way along ramps to cross the canal and railway line via concrete runways and runway ramps in an amenity designated areas. We would like to know, what other appropriate alternatives were considered if any?

Conclusion Section.

The proposed railway works covered by the proposed Railway Order are subject to an environmental impact assessment procedure and compulsory acquisition of lands and rights which have yet to be conducted.

This poses an immediate threat to many existing residential properties and family homes along the rail and canal corridor and routing many of which have been family occupied and maintained by occupants for over 100 years. Furthermore, some of the proposed lands form access rights to existing properties that are land-locked and where declared access rights have already been established.

Green bridges have the potential to address habitat fragmentation, enhance our post-industrial landscapes, and illustrate a step-change in our collective relationship with the natural world. For all the reasons outlined, we urge An Bord Plannála to refuse development and construction of high-elevated pedestrian, overpasses and foot /cycle passes that exceed the height of residential properties in close proximity to existing homes causing infringement to existing homes, residential safety and security and violation of privacy.

The Footbridge is 7m above Road (Ground) Level at the highest point and 6m above existing ground level in front of the school overlooking the back of the house North of the canal and West on Porterstown Road. This residence is 5m approx. high and therefore will be overlooked by pedestrians and cyclists travelling over the bridge. The footbridge is disproportionately big for its settings and more appropriate to a busy downtown station. The engineers would appear not to have looked at any alternative design. There does not appear to be any traffic impact study showing the numbers of pedestrian and cyclist traffic currently crossing Keenan bridge given that there are two major schools in close proximity to Keenan bridge where children (pedestrians) are being forced onto Porterstown Roadway (blocking car movement) and off the footpath because of the extent of pedestrian of high usage and pedestrian / cyclist traffic at peak school times. There is no data provided supporting motor or pedestrian traffic data provided.

The temporary land usage to possibly widen the Porterstown Road for construction is more likely to be a permanent arrangement which is opposed as it puts at risk the old Keane cottage on private family lands (a structure that we have requested as a family to be listed as a protected structure). It is stated that the construction site (compound) proposed on the old Clonsilla Schoolhouse site for the construction of the bridge will be required for two years is of concern to residents living at this particular location. Entrances and gateways are likely to be blocked during construction. The removal of gateways presents and security and safety risk to residents living on opposite sides of the road both North and South of the railway line/Royal Canal.

We would prefer to see a more considerate, creative, innovative, imaginative approach and sensitive design in over/under passes on rail /canals that have been implemented to very high standards and are considered and recognized as the very best in planning and design, that protect natural environment rather than destroy it, retain the ecological, biodiversity, naturalism and visual sense of natural environment that prohibits building and construction

of objects, bridges that significantly alter the "natural / rural" characteristic and landscape and not by constructing overpowering and dominating structures that actually in effect detract and destroy the environment (which is plain for everyone to see) while far better approaches have been achieved by our counterparts around the world and in Europe.

A greener and visually more appealing alternative could easily be taken based on the examples in this link – featuring Keswick in the UK. <https://www.alamy.com/stock-photo/keswick-railway.html> and preserving the original design of the Royal canal retaining the inherent characteristics of the original bridges and overpasses in its original shape, design and blend into and with nature as opposed to a mass monolith overbearing, dominating in an attempt to destroy the original and natural beauty.

Planning ought to be looking at what others have already implemented and even improved upon by adopting and applying best practices focusing on preservation and respect for the environment by retaining the natural and rural landscape especially when it comes to green/open amenity spaces as is the case along the Royal canal rather than designing and building structures that will dominate over the natural characteristic rather than blend into it.

The excessive height of the bridge will demean the rural and visual characteristic along the Royal Canal and linear park consisting of the Old Clonsilla School site and will immediately overlook adjacent residential housing to the North, South, East and West of Kennan Bridge. The Bridge in its present form is visually outside the existing residential footprint of Porterstown Road and is far higher than one/two story residential building at this location North and South of the railway line and Royal Canal.

A granting of permission in this instance will result in disorderly development and will create a dangerous planning precedent. The applicants need to realize that this location needs to retain its environmental and rural setting and not introduce construction with radical heights etc. A more conventional and sensitive design approach combined with retaining the rural and natural characteristics of the area along the Royal Canal both North and South of the Canal. There needs to be restrictions stipulated to safeguard speculative housing development and/or development of out of character construction in order to retain the rural characteristic by way of Amenity Order for the Royal Canal in this and all localities along the canal to prevent future threats and infringements into this space which should be seriously considered. There needs to be a serious commitment to ensure important Protected Structures— Clonsilla Old School and old Keane cottage in a cluster of structures at this specific location are retained as PS.

We object to the removal of a private entrance gate and proposed turn - about/roundabout immediately to the East of the Old School house and any opening of access by removal of gate to my families property in the site immediately to the east of said "new roundabout". Consideration needs to be given to the current levels of fly littering and dumping in the area, along the hedgerows on Porterstown Road, frequent dumping and littering at the Halting site, along the toe-path, at Keenan bridge and on the old-school house site by passing public traffic and public using St. Mochtas football fields and pedestrian traffic going too and coming from both schools.

Road Traffic and congestion due to double parking on Poterstown Road on the pathway restricts flow and renders unsafe passage of motor and pedestrian traffic as a result of pedestrian traffic being forced off the footpath and onto the public road during school going peak times and during recreational St. Mochtas match days/times of public use.

We ask that the Level Crossings at Ashtown, Coolmine, Portestown, Clonsilla and Barbestown be retained following the development of the Dart+ West Railway Project, as the proposed preferred option for traffic management is not adequate to manage vehicular traffic and will cause massive and unsustainable disruption to local communities.

Furthermore a permanent closing of the gate at Keenan Bridge to local / access traffic will limit residential traffic on Porterstown Road from being able to get off Porterstown Road at the Porterstown Road/Clonsilla Road junction especially during peak traffic hours where school drop-off/traffic results in traffic build up and delays entering/exiting Poretertown road at this junction. It is likely to cause assess problems getting in/out of the house/home to the east of the old school house. We would suggest the railway gate is opened for local/residential access at off-peak times and that the issue of school traffic and drop-off point is diverted away and repositioned off the Diswellstown Road.

We therefore urge the Bord to REFUSE Inrod Eireann planning permission as part of the Rail Order in building of highly elevated footpath/cycle bridge over Keenan Bridge in its current form and design as proposed and based its proximity (on the site) of the the Old Clonsilla House, itself a PS structure.

I enclose the appropriate fee and would appreciate an acknowledgement when you get time.

Sincerely,

Anna Keane & Family
Glen Garbh
Porterstown Road
Clonsilla, Dublin 15.

References:

Draft Rail Order

<https://www.dartplus.ie/S3mvc/media/DART-West-Railway-Order/1%20Draft%20Railway%20Order/Draft-Railway-Order.pdf>

Dart+West

<https://www.dartplus.ie/S3mvc/media/DART-West-Railway-Order/5%20Appropriate%20Assessment/Natura%20Impact%20Statement/Appendix-A-Description-of-the-Proposed-Development.pdf>

<https://greenworld.org.uk/article/bridges-future>

<https://www.nweurope.eu/projects/project-search/smart-circular-bridge-scb-for-pedestrians-and-cyclists-in-a-circular-built-environment/>

<https://www.icevirtuallibrary.com/doi/10.1680/ensu.2004.157.4.219>

<https://www.architecturaldigest.com/gallery/worlds-best-pedestrian-bridges>

https://nationalhighways.co.uk/media/ty1bf5xd/learning-on-the-road-to-good-design_case-studies.pdf

<https://www.alamy.com/stock-photo/keswick-railway.html>

Design:

https://webcms.pima.gov/UserFiles/Servers/Server_6/File/Government/Transportation/Roadway%20Design/EnvironmentallySensitiveRWY/ESR-WebsiteDocumentGuidelineswith4dmemo.pdf

Anti-Social Behaviour on Rail Network – On Trains and Across the Rail Network Infrastructure.

<https://www.independent.ie/irish-news/over-760-incidents-involving-anti-social-behaviour-on-rail-network-reported-in-first-six-months-of-year-41942600.html>

<https://www.live95fm.ie/news/live95-news/irish-rail-responds-to-reports-over-antisocial-behaviour-on-limerick-railway-bridge/>

<https://www.irishexaminer.com/news/arid-40305155.html>