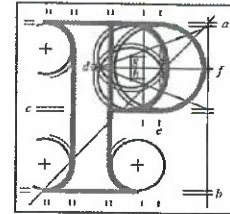


Our Case Number: ABP-314232-22



**An
Bord
Pleanála**

Pat Allison
4 Martin Savage Park
Ashtown
Dublin 15

Date: 18 November 2022

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

Dear Sir / Madam,

An Bord Pleanála has received your recent submission and oral hearing request (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you on this matter in due course.

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

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

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

RA05 (No Receipt to Issue)

| | | |
|--------------------|---------|--|
| Tel | Tel | (01) 858 8100 |
| Glaó Áitiúil | LoCall | 1890 275 175 |
| Facs | Fax | (01) 872 2684 |
| Láithreán Gréasáin | Website | www.pleanala.ie |
| Ríomhphost | Email | bord@pleanala.ie |

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

AN BORD PLEANÁLA
LDG- 058622-22
ABP- _____
28 OCT 2022
Fee: € 50.00 Type: cash
Time: 15.31 By: hand

4, Martin Savage Park,
Ashtown,
Dublin 15.

27th October, 2022.

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

Re; ABP-314232/22 - DART + Maynooth Railway Order Application.

Dear Sir/Madam,

I am PRO of Navan Road Community Council (NRCC) but submitting herewith on my own behalf. NRCC is a local Community Council operating throughout the area since 1968. Myself, and the committee are volunteers. We participate in, and more importantly, attempt to inform local residents of such planning issues, infrastructure and otherwise, impacting our area, our community and our lives.

Of late, this has become very difficult, with many so called 'public' consultations, such as Bus Connects, DART+ Maynooth online only, depriving members of the public not on the internet of all information.

I respectfully request you consider granting an Oral Hearing on this matter in due course to redress the failure to provide access to the digitally excluded in the communities impacted by these developments. I refer you to the following studies which identify digital exclusion in the planning process as a major problem.

STUDIES ON DEPRIVATION DUE TO LACK OF INTERNET CONNECTION;

TILDA – 2019 Trinity - 20 year Longitudinal Study;

AGE ACTION – October 2021 - Digital Exclusion and growth of ageing population.

HISTORY OF THE AREA

I grew up in Ashtown, and, as a child, lived in the Ashton House Gate Lodge.

Ashtown used to be part of Dublin County Council, prior to major boundary changes, maybe 40 years or more ago when it became part of the Dublin Corporation functional area. The current boundary line between the now Dublin City Council and Fingal County Council in this area is the white line down the middle of Ashtown Road – which runs from Ashtown Gate entrance to the Phoenix Park, across the Navan Road, at the current roundabout area (previously a 4way signalled cross roads) - down along Ashtown Road – over the rail line and the listed Longford Bridge on the Royal Canal. the boundary veers off around the rear of the new residential blocks of flats in Rathborne, Pelletstown, with the shopping area, ends at Scribblestown Cross on River Road. The road now running straight

through Rathborne Village received DCC Planning permission as part of the Pelletstown strategic infrastructure works in approx. 2000/01.

Growing up in Ashtown, the area was home to several Racing Stables, in one of which, Ashton House, my own father was a racehorse trainer. Ashton House is currently listed on the Fingal County Council Record of Protected Structures, as 'Ashton House, Gate Lodge and Gates'. Castleknock was also home to several Racing Stables. There was a turf training gallops in the '15 Acres' of the Phoenix Park - around which I once galloped on my pony, to be chased off by angry Park Rangers!

Horses still form part of the historic area of Ashtown & Scribblestown, with the Riding school in Ashtown, and valuable Riding horses and Polo Ponies within Scribblestown - all requiring safe passage across the Maynooth Line, as currently provided for in the guide of the level crossing.

Families live within Scribblestown; Teagasc has a facility there, as well as other small businesses. Families also live along River Road, along the Western Blanchardstown direction, a row of traditional cottages, beside which there is reputed to be an old graveyard - with 'very tall people buried' according to local legend.

PROTECTED STRUCTURES IN ASHTOWN - Fingal Development Plan - all on Fingal side of Ashtown Road.

1. Ashtown Mill and Mill Race on Mill Lane
2. Longford Bridge (over the Royal Canal)
3. Ashton House
4. Gate Lodge & Gates (to Ashton House)

N.B. Please note that in the developer's initial documents Ashton House was incorrectly identified as 'Ashtown House' a wonderful Tudor-style house, which used to stand on the grounds of the former Phoenix Park Racecourse at the junction of Navan Road and Ashtown Road. Dating from the 1920s, this arts and crafts Tudor-revival house was burned down by 3 'accidental' fires in the late '90's (dates available).

Incorrect identification was also given in the captions for pictures, showing '**Ashtown House as seen from Mill Lane**'. In fact:

- i) Ashton House is NOT 'Ashtown House' ;
- ii) Ashton House could never be seen from Mill Lane, as it is surrounded by an ancient woodland, which had a woodland walk all the way around the estate, around which myself and friends rode ponies, now overgrown & neglected by subsequent owners .
- iii) It is unknown to me what other misrepresentations or mistakes were included in the drawings/plans displayed elsewhere throughout all of D. 15.

These errors are sufficient to misdirect residents, particularly older residents of the established residential areas, into believing the development related to the former Ashtown House rather than to the Protected Structure of Ashton House.

CURRENT FOOTBRIDGE AT ASHTOWN TRAIN STATION;

The current bridge has 29 steps each side, and many of my neighbours from Martin Savage Park are unable to cross over due to the steepness of the steps and the number of steps. The proposed

gigantic new footbridge has about 46 steps on each side, accompanied by a long and winding walkway, taking one out of sight of all other people through a long, and lonely, winding structure.

Disability groups have timed the journey on the ugly new concrete footbridge at the new Pelletstown Train Station and report that it can take a wheelchair user over 10 mins to cross from one side to the other, depending on the type of wheelchair used. (It takes seconds for the same wheelchair user to cross the level crossing.) Throughout the elevated journey users are trapped in a no-exit structure which is not overseen from surrounding buildings and may encounter muggers or organised gangs of youths. These vulnerable local residents have no choice but to use the enclosed ramps provided or abandon their use of public transport entirely. Such poorly designed engineering solutions have already resulted in increased social exclusion for vulnerable local residents. These mistakes are now to be repeated, and augmented, at the other level crossings that are proposed to be closed, increasing social exclusion yet further.

The current level crossings have the benefit of providing universal level access for all members of society. This current residential amenity is to be withdrawn and replaced with a series of structures which ensure increased social exclusion. In no way can that be considered an appropriate planning response to an operational transport efficiency demand.

Retention and automation of the level crossings provides a better solution at considerably lower cost and considerably greater community acceptance and has the additional benefit of not increasing social exclusion.

The claimed sub-optimal operational efficiency of the railway needs to be balanced with the needs of the receiving communities and their long-established residential, economic and social amenity, not to mention their legal right to effective social inclusion. A quantification of the minor extra benefit to rail passengers of closing the level crossing must be balanced against the denial of rights of all the receiving communities affected and the degradation of the established amenity value of these biodiverse residential areas. Particular attention is warranted on the part of An Bord to safeguard the interests of the unconsulted elderly residents and the unrepresented young resident's interests in this matter. This has not been done by the developer and now falls to An Bord.

Children from within the Pelletstown development, with no access to a secondary school (and no plans to build one), must walk through Rathborne Village and up the Ashtown Road to access buses on Navan Road to reach secondary schools in either direction. Expecting a lone schoolchild to traverse such a lonely route as that presented by the unsupervised, no-escape, ramped route over train tracks and canal is not acceptable from a child safeguarding viewpoint. These schoolchildren will therefore lose their current travel independence as a result of this development. Have they been consulted? How many, in what fora and what was their view? The fact is they were not consulted as they are not rail users inconvenienced by having to slow down approaching a level crossing, the only constituency served by the proposed development.

I am not a nervous person myself, but would never wish to cross over such a large bridge, alone in the dark. I would not allow a grandchild of mine to do so on my behalf either. As an older person who regularly pops to the shops in Rathborne Village from my home in Martin Savage Park, my access to these essential local services in the dark winter evenings will be curtailed by this development. Alternative grocery and chemist shops are now considerably further away. The viability of businesses in Rathborne Village may be undermined by this development which will cut them off from an important source of customers.

Anti Social activities have taken place at Pelletstown footbridge since it opened - leading to call out of Gardai from Cabra Station.

PROPOSED TRAFFIC TUNNEL;

Horses from both sides of railway line - Ashtown & Scribblestown - cannot walk over the proposed footbridge. When asked how horses were to cross, an amazing suggestion was made to those on an Irish Rail/NTA Zoom meeting last year by one official, who advised 'Sure they can go down the tunnel'!

As a horse rider since the age of 4 years old, I would not dream of walking a horse down a long, artificially lit traffic tunnel shared with speeding cars, trucks and motorcycles. The suggestion that children learning to ride, from Ashtown Riding School should do so, beggars belief. The traditional association of this area with the horse will be killed off forever by this development

CLOSURES OF PORT TUNNEL:

Based on published official figures, the Dublin Port Tunnel was closed on 1,852 occasions in 2019, on 1,563 occasions in 2020 and on 1,477 occasions in 2021. These closures were due to collisions; break downs; fires and anti-social behaviour. Any such closure at the proposed road tunnel in Ashtown would sever all traffic from both sides, leading to long winding trips along River Road in both directions.

ALTERNATIVE PROPOSAL: SINK THE RAILWAY LINE

I propose that the rail line be lowered in a cutting below the level of Ashtown Road, leaving the road and footpaths safely in place for people; cyclists; cars, foxes, badgers, hedgehogs and horses. This confines the engineering works to below ground level ensuring that ugly intrusions into the visual amenity of the area are avoided.

The rail line is, in fact, artificially raised above the general ground level on an unstable embankment. This requires constant filling as it spreads under the vibration of passing trains. Extensive structural cracks can be seen in the surface of the towpath east of Ashtown Road. The level crossing bed has been raised regularly, as it has sunk under the weight of both trains and road traffic. An engineering solution is required to stabilise the embankment and the construction of a retaining wall to the side of the cutting and relocating the rail line onto lower stable ground would achieve this.

By relocating the bed of the rail track onto the existing ground level (evidenced by the surface level of the water in the canal east of ^{LONGFORD} ~~new~~ Bridge), the vibration of passing trains can be transferred directly to the ground. As the existing granite lough and railway cottage were both founded on the existing ground level, substantial retaining stone structures are in place to support these structures (the railway cottage has a basement as a result) whilst the railway cutting is made.

The railway cutting option was dismissed out of hand at the very first consultation and not subsequently entertained at any subsequent consultation. It has not been investigated by any Irish Rail engineer.

A private engineering consultant has volunteered to the Navan Road Community Council that the railway cutting option is feasible at Ashtown and would be cheaper to construct than the tunnel/overbridge combination solution which is the subject of this application. He further advised that the tunnel/overbridge combination also fails to address the instability of the canal/train embankment east of Ashtown Road and represents an incomplete engineering solution which does nothing to

*of which I am member
(PRO)*

address the potential inundation of houses in Pelletstown resulting from a structural collapse of the canal bank. In fact, closing the level crossing provides for more train movements and higher speed trains which is likely to substantially increase the risk of a collapse of the canal embankment.

It is unconscionable that such a risk continues to be ignored by engineers fixated on operational efficiency of the railway, at the expense of everything else.

An Bord should ask for evidence of cost and feasibility of the rail cutting option in order to assess its cost-benefit to rail users and to the receiving community. It is the only solution that provided for full separation of railway from other users whilst preserving the convenience and established amenity of current surface transit routes for all other users.

Yours Sincerely,

Pat Allison

Pat Allison (Mrs).

I enclose fee €50

Please acknowledge receipt in due course.

P.S. Longer trains would increase capacity, especially at

(1) Peak A.M. & P.M.

(2) Increased trains not necessary during off Peak hours.

(3) Some time ago my daughter who gets train home from work at Pearse St, usually a 6 or 8 carriage train, faced with crowd on platform a 4 carriage train - causing all to run frantically/dangerously to reach a door. Engineers later were told "Oh well had to put extra carriages on Dundalk train" !!

Proper management of longer trains at Peak hours will solve most of this outrageously uncaring & expensive proposal by unseen men - no women officials on any Zoom!