

Rathborne Village Residents Committee
C/O 13 The Waxworks
Rathborne Village
Ashtown
Dublin 15
D15 YX92

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

27 October 2022

Subject: DART+ West Railway Order Application

Dear Sir/Madam

Rathborne Village is a mixed use development comprising 257 apartment homes and 15 businesses in three buildings – The Chandler, The Waxworks and The Tallow. It is situated immediately to the north of the railway and Royal Canal. Ashtown road goes through the centre of the development, while the Mill Lane is situated alongside the western-most building, the Chandler.

We are writing to represent the residents of Rathborne Village.

Given it's proximity to the railway, Ashtown level crossing and the proposed underbridge along Mill Lane, the DART+ West Railway project is significant for the people and businesses in Rathborne Village.

We welcome the service enhancements and reduction in noise and pollution from the introduction of electric trains and the removal of cars queuing at the level crossing that will arise from the DART+ West project.

We have a number of observations related to the DART+ West Railway Order application by CIE / Irish Rail within this submission which relate to:

- Safe and reliable access to local amenities for the community
- The potential for anti-social behaviour around the proposed pedestrian/cycle bridge and underbridge
- The need for additional photomontages of the proposed pedestrian/cycle bridge at Ashtown
- Integration of the proposed design into the local area
- Land ownership
- The environmental impact of the project

We wish to request an oral hearing as part of the Railway Order Application process.

Safe and reliable access to local amenities for the community

While we would prefer no change to the visual amenity at Ashtown, we appreciate that the proposed pedestrian/cycle bridge provides reasonable alternate access for pedestrians and cyclists over the railway when the level crossings are permanently shut.

In the absence of this bridge, the plans as set out in the first consultation by Irish Rail would have left those with impaired mobility, wheelchair users, buggies or bicycles reliant on an isolated underbridge and road to go between the north of the railway (Rathborne/Pelletstown) and the Navan Road, Phoenix Park and beyond, in the event that the proposed lift was out of order. Many would have felt unsafe and would have been at greater risk of experiencing crime or anti-social behaviour.

This route alone would not have met a range of the policy ambitions including the NTA's Greater Dublin Area (GDA) Transport Strategy 2016-2035 (see annex 1) and the NTA's 'Permeability – A best practice guide' that permeable neighbourhoods have "Secure, well-lit, overlooked pedestrian and cycle links between housing areas and between housing and local/district centres."

In addition movement and access policy MA07 of the Pelletstown-Ashtown LAP expects Dublin City Council^{1 2}:

*"To encourage and facilitate, in cooperation with Fingal County Council and Iarnrod Éireann, the replacement of the existing manually operated rail level crossing at Ashtown Road, with a suitably designed alternative. **The eventual design shall have regard to both existing and proposed developments in the immediate vicinity of the plan area and provide for high quality pedestrian and cycle facilities linking with existing and proposed pedestrian and cycle networks both within and surrounding the LAP area.**"*

At points during the consultation period it was set out by Irish Rail that the bridge crossing the railway would only be available during station operating hours.

We propose that any approval of the railway order application is subject to the condition that Irish Rail make the pedestrian and cycle bridge permanently available to the public, not just rail users, at all times, day and night 365 days a year.

As mentioned above, the initial proposal did include a stairway only for pedestrian's crossing the railway and a lift. There was significant concern that those who could not take the stairs to cross the railway either as rail passengers or for local travel would have to use an isolated underpass whenever the lifts were out of order. The current proposal does not include any lifts, albeit that lifts were not the issue in the above concerns, but the alternative route through the underbridge in the event they were out of order.

It is not clear that the current proposal ensures reasonable access for all - see for instance this [link](#)³ from Access for All in relation the ramp at Pelletstown station. If not, **it may be necessary to incorporate a lift into the design**, with the pedestrian/ramp still offering safe access to

¹ https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/Pelletstown_Full_Doc_January_2013_Part2.pdf

² The LAP refers Pelletstown-Ashtown, which comprises Rathborne and Royal Canal Park. Elsewhere in this submission, I have used the name Rathborne to refer to the area to the north of the canal, starting at Rathborne Village to the west and ending just past Crescent Park to the West.

³ https://twitter.com/accessforall7/status/1450488849823834753?s=46&t=WMn1XsyVJWFkcBRPXLki_g

most pedestrians and cyclists and those with impaired mobility in the event that the lifts are out of order. While this may increase the visual impact of the bridge, it is important that accessibility objectives as set out in the GDA transport strategy excerpt in annex 1 are met.

We propose that any approval of the railway order application is subject to the condition that Irish Rail further engage with bodies representing both wheelchair users and the elderly to understand whether the current approach meets accessibility and inclusion objectives satisfactorily. If not, a lift should be installed.

Anti-social behaviour

Pelletstown station, which includes a pedestrian and cycle bridge, has experienced significant anti-social behaviour since it was opened one year ago. Just recently the coverings over the bike parking have been removed as they were damaged soon after their installation. **Measures aiming to prevent the pedestrian/cycle bridge, underbridge and associated access from becoming focal points for anti-social behaviour would be welcome.**

We propose that any approval of the railway order application is subject to the condition that Irish Rail take steps, including engagement with local Gardai, Dublin City / Fingal County Council/ and Councillors and the local community (1) to find solutions to minimise the risk of anti-social behaviour around new infrastructure and (2) engage proactively where issues of anti-social behaviour arise during the operational phase.

Photomontages

At the third pre-application consultation meeting with An Bord Pleanála on the 8th October 2020 a discussion was had regarding the provision of photomontages.

"The Board queried the proposed use of photomontages for the proposals at the different level crossings and considered same would be very useful particularly from public open spaces or sensitive locations in terms of visual/residential amenity. The prospective applicant outlined that the proposal is currently at early design stage and is evolving with ongoing public consultation with the provision of photomontages not considered necessary at this stage". (Meeting minutes accessed on line)

The photomontage methodology was outlined at the meeting of the 21 January 2021 ABP was informed that they would be included in volume 4 of EIAR.

The photomontages provided for the proposed pedestrian and cycle bridge at Ashtown, although many, do not provide sufficient perspective of the visual impact for the two closest residential developments, Rathborne Village and Martin Savage Park, as well as other nearby houses. In addition, a request had been made to Irish Rail to provide some context by providing photomontages of the proposed bridge overlayed on the current pedestrian bridge. I do not believe that the photomontages provided have provided sufficient insight to the visual impact of the bridge on both developments, in line with pre-application engagement with An Bord Pleanála.

We propose that any approval of the railway order application is subject to the condition that Irish Rail provide An Bord Pleanála, local residents in Rathborne Village, Martin Savage Park and other nearby homes with additional photomontages to better demonstrate the visual impact of the proposed pedestrian / cycle bridge on the area.

Integration of the proposed design into the local area

The closure of Ashtown level crossing will sever the existing connect along Ashtown road and significantly change the function of the road and the nature of the public realm, in what is an area with significant built heritage (the mill, Ashton House, Longford Bridge and the canal itself) and biodiversity (serving as a link between the Tolka Valley, the Canal and the Phoenix Park⁴).

Chapter 16 of Dublin City Council's 2016-2022 development plan⁵ sets out design principals for new development. It is not clear the extent to which they apply to infrastructure projects, but they still provide an important reference when seeking to achieve balance between DART+ West objectives and the impact it has on the local area. It states that:

*"... the philosophy of Dublin City Council is to develop a planning approach that values urbanism and the creation of **vibrant, safe, comfortable and attractive urban places** where people want to live, work, meet and enjoy their leisure time. **Legibility, connectiveness, identity, diversity and quality in the public domain** are key objectives underpinning this approach and will be sought in all planning applications. The relationship between the street/public space/square, the buildings and their use will be of paramount importance. **The City Council will expect applicants to demonstrate a comprehensive and integrated approach to design of all development.**"*

As a reminder this is also specifically addressed in movement and access policy MA07 of the Pelletstown-Ashtown LAP for Dublin City Council:

*To encourage and facilitate, in cooperation with Fingal County Council and Iarnrod Éireann, the replacement of the existing manually operated rail level crossing at Ashtown Road, with a suitably designed alternative. **The eventual design shall have regard to both existing and proposed developments in the immediate vicinity of the plan area** and provide for high quality pedestrian and cycle facilities linking with existing and proposed pedestrian and cycle networks both within and surrounding the LAP area.*

In addition, the Cultural Heritage Policies and objectives include:

CH1: *To promote awareness, appreciation and protection of the cultural and built heritage of the Ashtown-Pelletstown plan area and environs in order to sustain its unique significance, fabric and character and to ensure its survival as a unique resource to be handed over to future generations*

CHO1: *To protect and conserve the special character of all built heritage features both within the plan area as well as those within the surrounding areas*

We are concerned that the planning focus in relation to DART+ West has been almost completely on functional aspects relating transport and supporting infrastructure, with limited consideration for how to best integrate it into the communities through which the railway passes, serves and affects. This has been reflected by limited to no visible involvement by urban designers within the project team.

In the above project and policy context we have the following observations:

⁴ Proposed as a cycle link also in the Greater Dublin Area Transport Strategy

⁵ <https://www.dublincity.ie/sites/default/files/2020-08/written-statement-volume-1.pdf>

Bridge appearance

While the use of corten steel is preferable to concrete in terms of visual effect and carbon emissions, further efforts could be made to soften it and better integrate it into the local area. Suggestions include:

- **Laser cutting of designs** reflecting the biodiversity (flora and fauna) of the canal and the industrial heritage of the area, perhaps with involvement of the local community and school in selecting relevant images or themes. See annex 2 for examples. At a minimum some level of texture or design could soften the visual impact.
- **Living walls** which would soften the appearance of some of the new infrastructure and also mitigate some of the effect of vegetation removal. This could only go on sides not overhanging the railway to avoid any safety risks. In the event that a lift is installed, if it were concrete, these may help minimise the visual impact.⁶

Also consideration will need to be given to the ongoing maintenance of the bridge, particularly how graffiti will be removed and its impact on the rusty appearance of the steel.

We propose that any approval of the railway order application is subject to the condition that Irish Rail budget for and consider approaches to soften the appearance of the bridge at Ashtown (and potentially other locations) and engage with the local community at the design phase.

Ashtown Road alternative uses

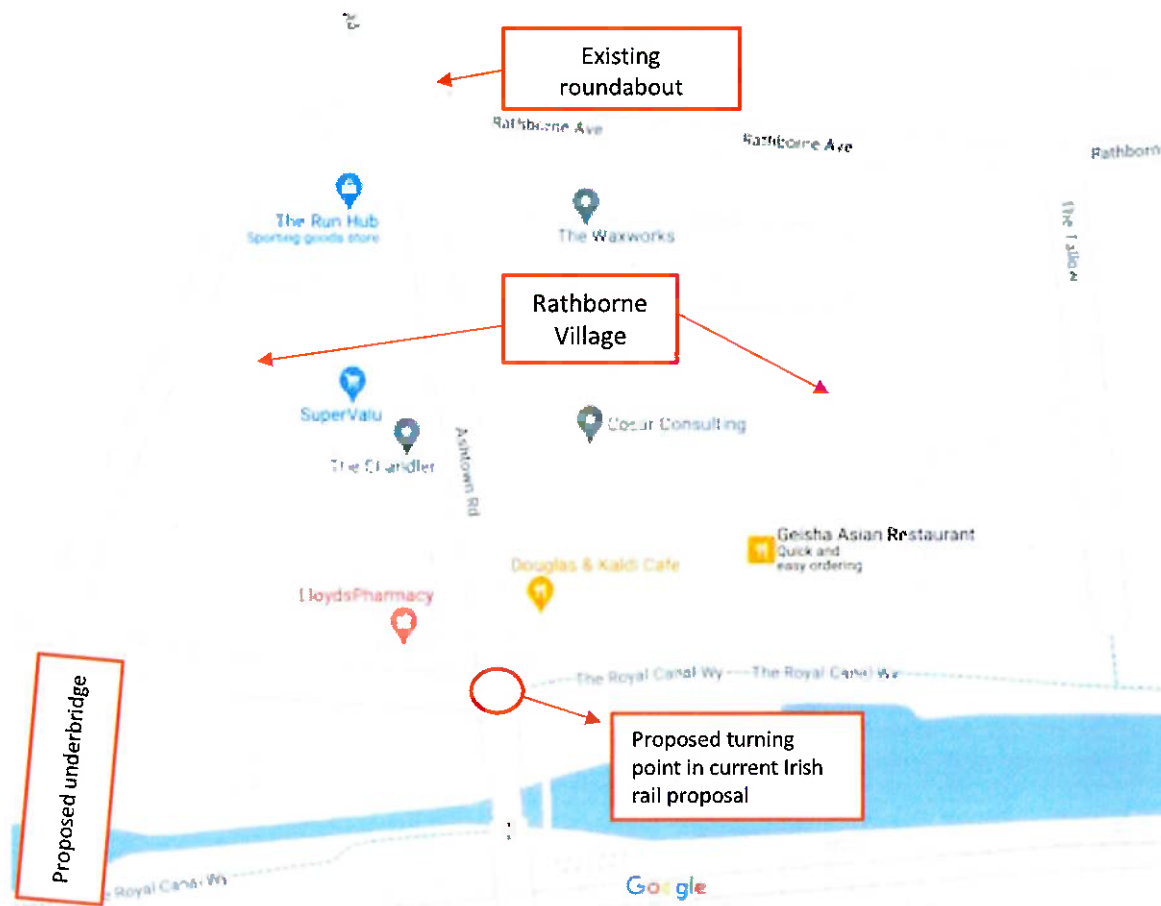
Ashtown road will effectively become a cul de sac both sides of the canal. To the north, the road runs through Rathborne Village. The current Irish Rail proposals have a turning/drop-off point just before Longford Bridge where the road ends⁷ (see map below). crossing greater attention needs to be paid to the public realm. We propose that changes to the road and the public realm in Rathborne Village need to be considered as part of the Irish Rail plans, including allowance to amend for change of use in the area, such as softer landscaping, etc. In addition, to the west of Rathborne Village, Mill Lane will become the main thoroughfare which may require changes to the roadside to reflect this.

An alternative option is to facilitate drop-off/turning at the existing round-about just north of the development at the junction with Rathborne Avenue, which would allow for the pedestrianisation of Ashtown Road through Rathborne Village (still allowing for commercial deliveries).

We propose that any approval of the railway order application is subject to the condition that Irish Rail make allowance for a change of use in the area of Rathborne Village and proactively engage with Rathborne Village Owners Management Company Limited by Guarantee, Castlethorn Construction and Dublin City Council in order to agree on the appropriate use of Ashtown Road once the level crossing is closed and appropriate enhancements to the public realm, reflecting the change of use.

⁶ See for instance <https://livingwalls.ie/projects/trinity-college-business-school/>

⁷ <https://www.dartplus.ie/S3mvc/media/DART-West-Railway-Order/3%20Railway%20Order%20Drawings/Book%203%20Structures%20Plans/Specific%20Locations/06-Ashtown.pdf> - MAY MDC HRW LC01 DR C 0104 D



Fencing

Irish Rail propose to replace the closed level crossings with palisade fencing (see section 4.5.15.2 Level crossing removals of chapter 4 of the EIAR and picture below)⁸. This fencing would be completely out of keeping with the local area. While we understand the need to secure the railway an additional wall or other more aesthetically pleasing barrier could be installed, perhaps with (artistic) reference to the manned level crossing currently in place.

We propose that any approval of the railway order application is subject to the condition that Irish Rail consider and budget for appropriate fencing or coverage of palisade fencing where it is located in more sensitive areas, such as at the location of the current level crossing adjacent to Longford bridge and engage with the local community in arriving at solutions that complement the existing public realm.

⁸ <https://www.dartplus.ie/S3mvc/media/DART-West-Railway-Order/4%20EIAR/Volume%202%20Main%20Text/Chapter-04-Description-of-the-Proposed-Development.pdf>



Figure 4-27 Palisade fence example

Environmental impact

On the basis of the EIAR we have a number of concerns or areas where we believe the information provided raises questions or could be incomplete.

In addition, we could not see any reference to the European Commission's Notice — Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (C/2021/5430)⁹ within the EIAR documentation. That guidance states that:

"From the date of its initial publication by the European Commission, this guidance should be integrated in the preparation and climate proofing of infrastructure projects for the period 2021-2027."

The guidance incorporates recent policy actions at an EU level in relation to climate change mitigation and adaptation and is based on lessons learnt from climate proofing major projects over the period 2014-2020. Given both the fiscal and greenhouse gas (GHG) emission costs associated with this project, it is vitally important that this guidance has been incorporated into the EIAR for this project.

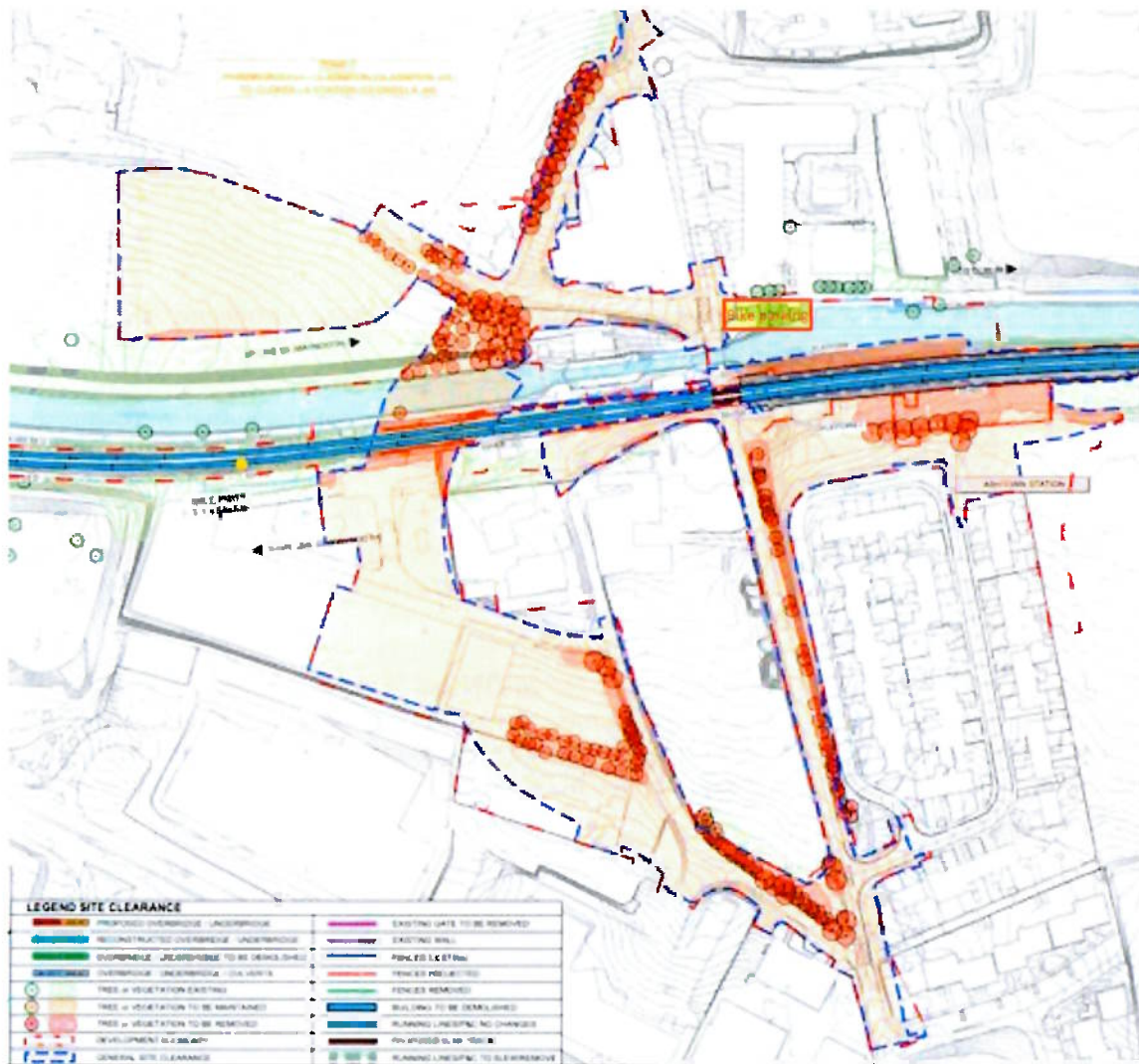
We propose that any approval of the railway order application is subject to the condition that Irish Rail demonstrate how the EIAR has fulfilled the European Commission's Technical guidance on the climate proofing of infrastructure in the period 2021-2027 (C/2021/5430). Where this cannot be demonstrated, Irish Rail are to complete the relevant assessment and share it with An Bord Pleanála and the public prior to the granting of permission to proceed with DART+ West works.¹⁰

⁹ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv%3AOJ.C_.2021.373.01.0001.01.ENG

¹⁰ In this regard, where there is new information we believe that those who have already made a submission in relation to the Railway Order Application should not have to pay an additional €50 to make further observations.

Extent of tree removal in Ashtown

The level of tree and vegetation removal in the Ashtown area will have a substantial impact on the bio-diversity and well-being of those living in the area. We are currently fortunate to be surrounded by a significant amount of mature trees (see annex 3), but it would appear that as part of this project, including the construction phase, Irish Rail plans on removing a significant amount of trees, hedgerows and other vegetation. The clearance map below does also not make clear that at least some vegetation and possibly some trees (highlighted in yellow as an addition to the map) will be removed to facilitate bicycle parking to the north of the canal.



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While there are mitigation plans to plant new trees and vegetation, which is welcome, the impact of removal of mature trees cannot be underestimated from bio-diversity, human health and climate resilience perspectives. In this context we struggle to understand why Irish Rail has

¹¹ <https://www.dartplus.ie/getmedia/0fe2655d-321c-4827-8ba4-12ebf733ebe7/Site-Clearance-Zone-C-Part-1.pdf?ext=.pdf> – MAY MDC LMA SC05 DR Y 0001 D, with own addition regarding bike parking which has been omitted from the drawing but is mentioned in the documentation and correspondence from Irish Rail.

put the landscape/visual impacts as being slightly negative with a moderate-neutral localised impact for the Ashtown area¹².

The Dublin City Tree strategy 2016-2020¹³ also highlights the importance of trees in the city where they provide the following eco-system services, including:

- Shading and cooling
- Storm water attenuation, where they help to reduce localised flooding;
- Improving air quality
- Biodiversity and habitat
- Storing carbon
- Physical and mental wellbeing
- Aesthetic and improved property values
- Energy saving for adjacent buildings"

Irish Rail has said as part of it's mitigating measures that an Arboricultural Impact Assessment will be produced for the area of the proposed development, as well as for any adjoining areas where trees are likely to be impacted by the works, in accordance with British Standard Institution (BSI) British Standard (BS) 5837:2012 'Trees in relation to in relation to design, demolition and construction - Recommendations' (BSI 2012). Given the extent of tree removal at Ashtown and elsewhere, we would have expected such an assessment to have been included as part of the Railway Order Application.

It is unclear why some trees need to be removed, such as along Ashtown road to the South, while we believe that a number of changes to the plans and more careful consideration of design at Ashtown could reduce tree and vegetation loss as well as the carbon footprint of the scheme. While we hope that a more in depth assessment of the need for the scale of tree and vegetation removal across the whole project area and in Ashtown would be conducted, two non-exhaustive suggestions and queries in relation to Ashtown are included below.

We propose that any approval of the railway order application is subject to the condition that Irish Rail (1) conduct an Arboricultural Impact Assessment and share it with An Bord Pleanála and the public prior to approval to proceed with DART+ West works; and (2) evaluate how the level of tree and vegetation loss can be minimised from the DART+ West project compared to current proposals. ¹⁴

1) Unclear impact of cycle parking on trees north of the canal

While tree removal is not shown in the diagram MAY MDC LMA SC05 DR Y 0001 D at the location of bicycle parking¹⁵ the description of the proposed development makes it clear that

¹² <https://www.dartplus.ie/S3mvc/media/DART-West-Railway-Order/4%20EIAR/Volume%203A%20Technical%20Figures/Chapter%2015%20Landscape%20and%20Visual%20Amenity/Landscape-and-Visual-Impacts-Part-1.pdf> - MAY MDC LAN ROUT DR U 15008 D

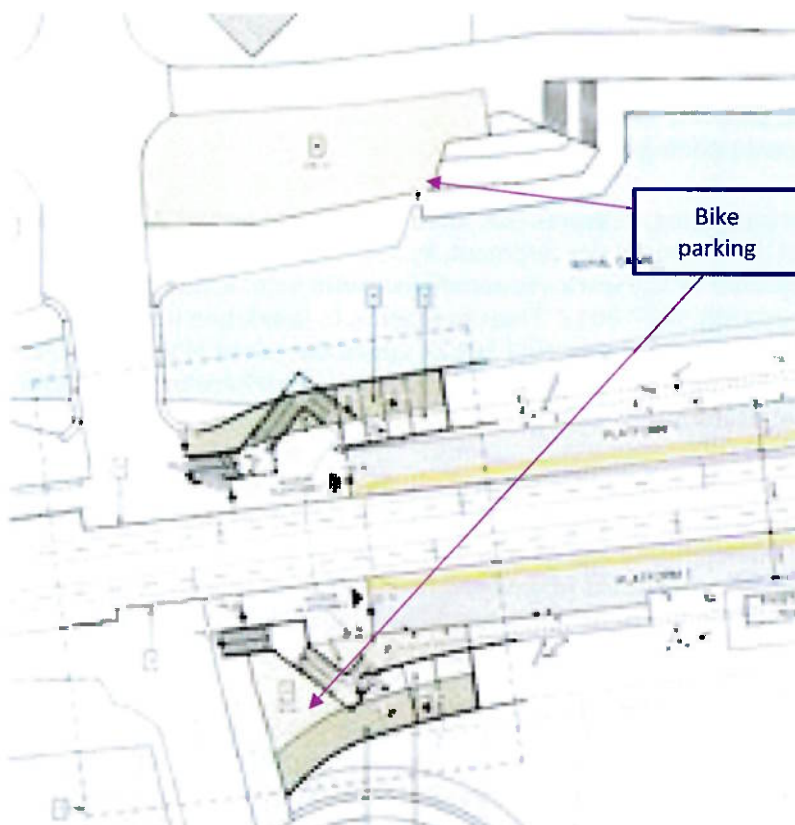
¹³ [https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-08/Dublin City Tree Strategy 2016-2020.pdf](https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-08/Dublin%20City%20Tree%20Strategy%202016-2020.pdf)

¹⁴ In this regard, where there is new information we believe that those who have already made a submission in relation to the Railway Order Application should not have to pay an additional €50 to make further observations.

¹⁵ <https://www.dartplus.ie/S3mvc/media/DART-West-Railway-Order/4%20EIAR/Volume%202%20Main%20Text/Chapter-04-Description-of-the-Proposed-Development.pdf> - section 4.8.5.3 and Figure 4-127

existing vegetation will be removed¹⁶, while a response from Irish Rail in relation to queries indicates that “the existing trees will be preserved as much as possible” (see annex 4).

The analysis in table 4-17 indicates that 37 bicycle parking spaces are needed requiring 61m² of space. However, 230m² is being allocated to the north of the canal (area mentioned above) with a further 70m² at the south of the railway. It is not clear why the areas each side of the canal are so unevenly distributed, or why such a large area is needed relative to Irish Rail’s own analysis. Greater dispersion of bicycle parking could minimise the impact on vegetation and trees north of the canal.



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We propose that any approval of the railway order application is subject to the condition that Irish Rail (1) re-assess the distribution of bicycle parking north and south of the canal and railway at Ashtown, making changes as relevant; (2) re-assess the area being taken for bicycle parking at Ashtown compared to the area determined by its own assessment¹⁸; and (3) minimise the extent of removal of vegetation and oak trees located in the proposed bicycle parking location north of the canal.

¹⁶ Table 4-15 and Figure 4-121

¹⁷ <https://www.dartplus.ie/S3myc/media/DART-West-Railway-Order/3%20Railway%20Order%20Drawings/Book%203%20Structures%20Plans/Specific%20Locations/06-Ashtown.pdf> - MAY MDC ARC RS07 DR A 0003 D – with own additions marking bike parking and red dotted line arrows

¹⁸ 300m² compared to the amount determined as need in its own assessment – 61m²

2) Substation location

The current substation location and construction site on the green to the north of Martin Savage Park estate will see a most of the semi-mature trees there removed from that green alongside the trees within the Irish Rail boundary. This will remove some of the potential shielding of the new bridge for residents of that estate. While some tree removal is inevitable with the installation of the bridge, I believe that the extent of removal can be reduced, while also reducing the impact on residents of Martin Savage Park.

Irish Rail own land to the west of Ashtown Road and north of the stables beside the railway. It is currently used for materials storage for maintenance, but Irish Rail also has a similar site at Reilly's bridge (8th lock), so the current space could be used as an alternative location for the substation and construction activity – see the diagram below.



We propose that any approval of the railway order application is subject to the condition that Irish Rail re-assess the plausibility of moving the proposed substation and construction site at Ashtown to its own lands to the west of Ashtown Road.

Lighting

We are unclear from the information provided how lighting used will minimise the impact on local biodiversity, in particular given the proximity to the canal and rural areas.

Construction impacts

We have had current experience of living in close proximity to a building site with associated dust and dirt. Particulate matter is associated with negative health outcomes, particularly respiratory illnesses. For instance, multiple studies demonstrated a link between increased incidence of Covid 19 and increased mortality where people were exposed to particulate matter (PM 2.5 and PM 10)¹⁹.

We note that most works will be conducted by Irish Rail at night in Ashtown. Our experience of night time works on the railway is that noise levels can be high but also the type of noise is particularly disturbing/high pitched during track works. The impact on local residents and their families has the potential to be significant.

¹⁹ <https://www.europeanreview.org/article/27455>

Finally, we are concerned about the risk of odours and higher level of rodent activity when the canal is drained at Ashtown.

We ask that every effort is taken to minimise the construction impacts on the local community, and in particular those living in close proximity to the railway and key construction works.

We propose that any approval of the railway order application is subject to the condition that Irish Rail (1) rigorously apply the mitigation measures proposed during the construction phase at Ashtown; (2) proactively engage with residents where issues arise; and (3) identify opportunities, including temporary line closures at weekends to complete more extensive works, in order to reduce the significant impact of construction works on local residents, particularly at night.

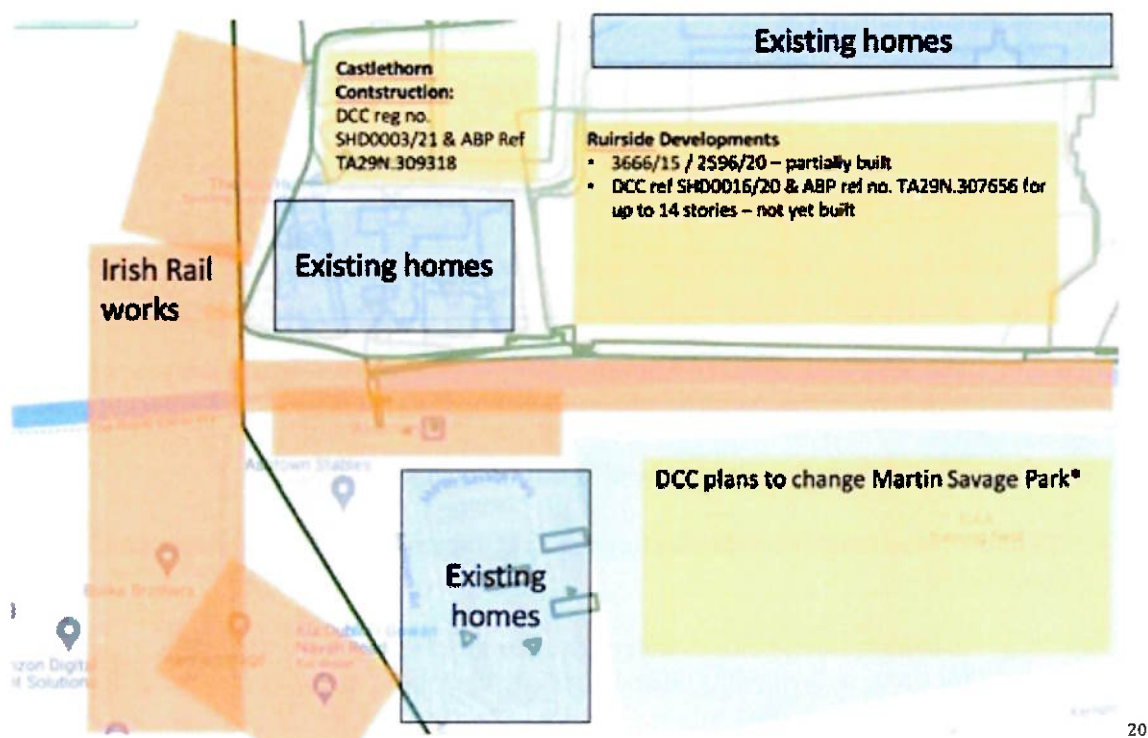
Cumulative impacts

It is likely that the main works at Ashtown will coincide with works on two large developments either side of Rathborne Village (as confirmed by the developer - Castlethorn). In effect Rathborne Village is likely to be surrounded by construction sites – see diagram over the page. This further amplifies concerns raised in the section above.

What steps can be taken by Irish Rail and Dublin City Council to work with the developer to mitigate the impacts on local residents, in particular residents of Rathborne Village? For example, could the developer to minimise the impact on local residents, akin to those proposed by Irish Rail in its mitigation actions to reduce dust, etc.

Similarly, the cumulative impacts on biodiversity in the area will be even more severe, with greater land clearance than that envisaged in the Irish Rail plans. This comes on top of recent land clearance for phase one of the Ruirside developments building (also Castlethorn) and planned upgrades to the St Oliver Plunkett and Pheonix Football club pitches in Martin Savage Park.

We propose that any approval of the railway order application is subject to the condition that Irish Rail engage with Castlethorn construction and, if necessary, Dublin City Council, where there is contemporaneous development of sites surrounding Rathborne Village and DART+ West construction to: (1) assist in the application of similar mitigating actions in terms of dust and pollution for residents of the area; and (2) coordinate activities to minimise the impact on the area.



Thank you for taking the time to review this submission. Please contact us at rathbornevillage@gmail.com in the event that you have any questions in relation to its content.

Yours faithfully

Anna Lalor

Anna Lalor, on behalf of Rathborne Village Residents Committee

²⁰ Source: <https://mapzone.dublincity.ie/MapZonePlanning/MapZone.aspx> - Planning granted layer
<https://councilmeetings.dublincity.ie/mgConvert2PDF.aspx?ID=37718>

Annex 1 – Relevant policy

NTA's Greater Dublin Area (GDA) Transport Strategy 2016-2035²¹ –

- The enhancement of the pedestrian environment, including measures to overcome severance and to increase permeability, is a priority;
- The GDA's transport infrastructure and services must be planned for and invested in on the basis of a number of aspects including:
 - That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and
 - That the environment in the GDA is protected and enhanced
- To address the issues raised in Section 3.2.5 relating to provision for pedestrians, it is intended to:
 - Provide a safer, more comfortable and more convenient walking environment for those with mobility, visual and hearing impairments, and for those using buggies and prams;
 - Support pedestrian permeability provision in new developments, and the maintenance, plus enhancement where appropriate, of such arrangements in existing developments; and
 - Ensure that permeability and accessibility of public transport stops and stations for local communities is maintained and enhanced.

National Planning Framework (NPF)²²:

- In relation to securing compact and sustainable growth, the framework focuses on four key areas, one of which is:
- The 'liveability' or quality of life of urban places – how people experience living in cities, towns and villages. This includes the quality of the built environment, including the public realm, traffic and parking issues, access to amenities and public transport and a sense of personal safety and well-being.
- For Dublin, the NPF, sets out key future growth enablers for Dublin, which as well as the DART expansion include:

²¹ <https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport-Strategy-for-the-Greater-Dublin-Area-2016-2035.pdf>

²² <https://www.gov.ie/pdf/?file=https://assets.gov.ie/166/310818095340-Project-Ireland-2040-NPF.pdf#page=1>

- The development of an improved bus-based system, with better orbital connectivity and integration with other transport networks;
 - Measures to enhance and better link the existing network of green spaces, including the Phoenix Park and other parks, Dublin Bay and the canals, subject to carrying out a routing study and any necessary environmental assessments;
 - Delivery of the metropolitan cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of key commuter routes and urban greenways on the canal, river and coastal corridors;
 - Public realm and urban amenity projects, focused on streets and public spaces, especially in the area between the canals and where linked to social generation projects.
- In relation to people, homes and communities the NPF states that “While the National Planning Framework cannot effect change in all of the dimensions that contribute to quality of life, there are some key elements that it will directly impact on, most importantly ‘the natural and living environment’. This is why place is intrinsic to achieving good quality of life - the quality of our immediate environment, our ability to access services and amenities, such as education and healthcare, shops and parks, the leisure and social interactions available to us and the prospect of securing employment, all combine to make a real difference to people’s lives.”
 - A number of the national policy objectives are also very relevant.
 - **National Policy Objective 27:**

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.
 - **National Policy Objective 28:**

Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.
 - **National Policy Objective 30:**

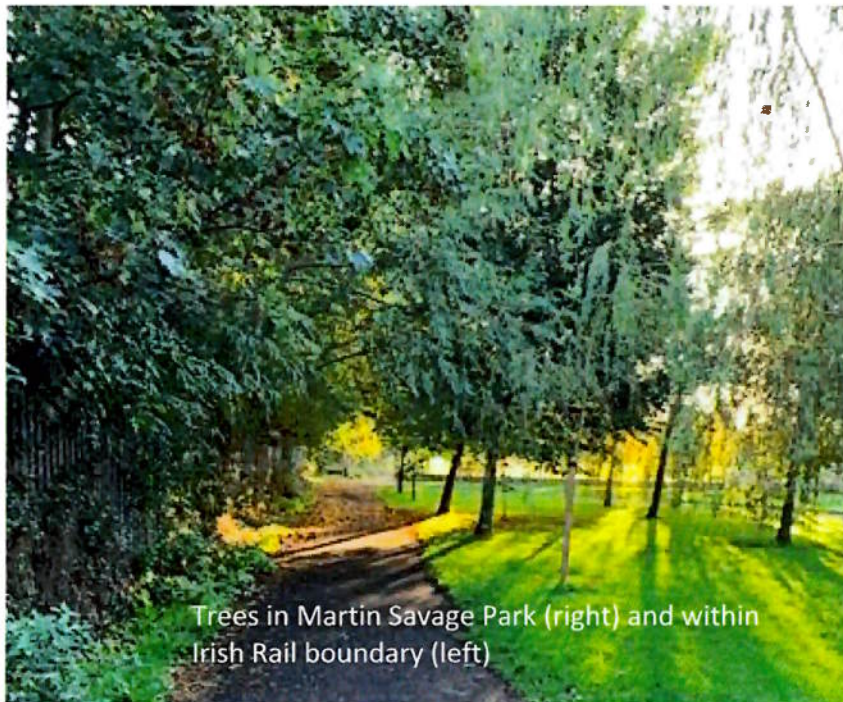
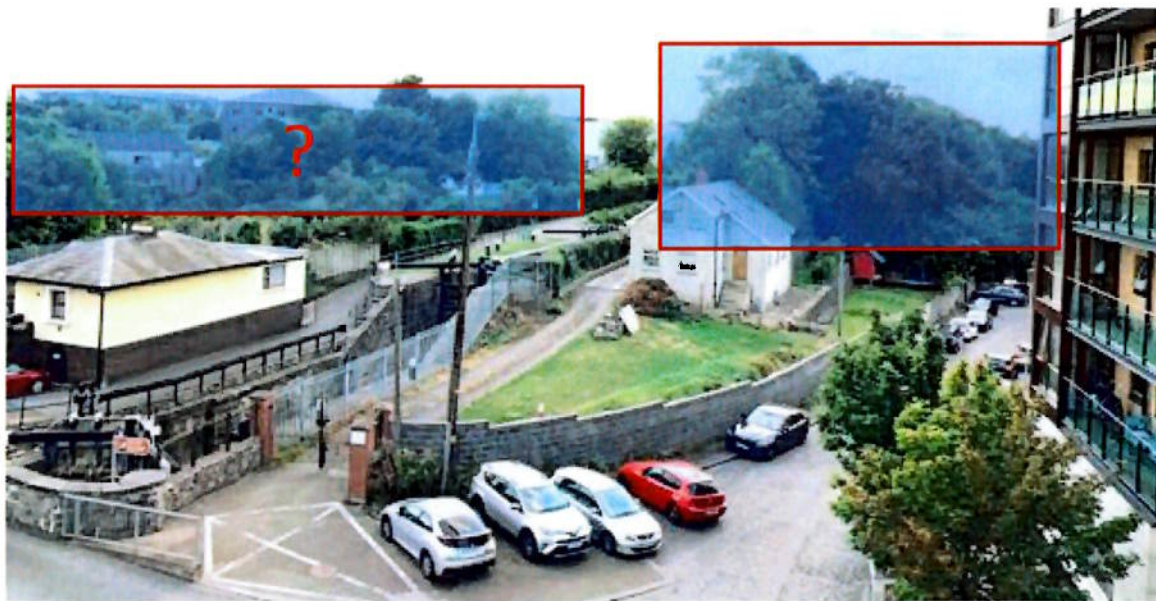
Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

Annex 2 - Corten steel laser cutting examples



Annex 3 – visual and impact of tree removal, with associated biodiversity and carbon capture loss





Location of proposed bike parking – level of tree and vegetation removal unclear



Annex 4 – Excerpt of email response from Irish Rail



Queries and community engagement

DARTWest <DARTwest@irishrail.ie>
To: Anna Lalor [REDACTED]
Cc: DARTWest <DARTwest@irishrail.ie>

6 October 2022 at 12:19

Dear Anna,
Responses are as follows
Kind regards,
Garry

Bicycle parking

Chapter 4 – Description of Proposed Development figure 4-127 shows bike parking as being along the canal outside Douglas and Ketchi café. How many of the 31 bike parking spaces will be allocated here? Is this where all bike parking is expected to be allocated or will there be some on the south side of the canal and railway?

As set out in Chapter 4, Section 4.8.5.3 bicycle parking provided is based on guidance from the National Cycle Manual. As per the calculation shown on page 4-101 of Chapter 4 of the EIAR, provision for 37 bike parking spaces will be provided in a 51m² footprint. Bicycle parking is not envisaged on the southside of the canal.

It is not clear exactly what changes are going to be made to this area. Figure 4-121 of chapter 4 indicates vegetation removal, while the site clearance map for zone C part 1 shows no tree or vegetation removal. Is the intention that vegetation and/or existing trees would be removed?

The vegetation clearance drawings, specifically MAY MDC LMA SC05 OR Y 0001 D Sheet 6 of 17 in Volume 3A of the EIAR provides the extent of vegetation removal anticipated at this stage of the project. See link below. In order to facilitate the 37 bicycle spaces listed above some vegetation will be required to be removed however trees will be preserved as much as possible.

<https://www.dartplus.ie/getmedia/0fe2655d-321c-4827-8ba3-12ebf733e6e7/Site-Clearance-Zone-C-Part-1.pdf?ext=.pdf>

Are there plans for bike parking coverings (similar to that at Peckettstown station, where roof coverings have since been removed) or would this area be left open (or under existing tree cover)?

Bicycle parking covers/shelter is not envisaged, and the existing trees will be preserved as much as possible.