

## CUNNANE STRATTON REYNOLDS

ABP Ref: NA29S.314232

Our Ref: 22364

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

27/10/2022

**RE: Dart+ West Draft Railway Order 2022**

**Submission on behalf of St Mochta's FC, Porterstown Road, Clonsilla, Dublin 15**  
ABP Ref: NA29S.314232

Cunnane Stratton Reynolds of 3 Molesworth Place, Dublin 2 has been appointed to prepare this submission on behalf of our client, St. Mochta's FC Porterstown Road, Clonsilla, Dublin 15 in respect of the Draft Railway Order for the development of DART+ West.

### Introduction

This St Mochta's Submission comprises this letter on the club, planning and general development matters and a second accompanying document, a transport assessment undertaken by Transport Insights. This document also summarises the Transport Insights document attached. Please find an attached fee of €50 made payable to An Bord Pleanála by cheque for this submission.

### The Club

St. Mochta's Football Club was founded in September 1949 when founder Barth O'Brien put a motion to the AGM of the St. Mochta's Branch of the Catholic Young Men's Society (CYMS) that a football section be formed within the branch. The club is located within the parish of St Mochta's.

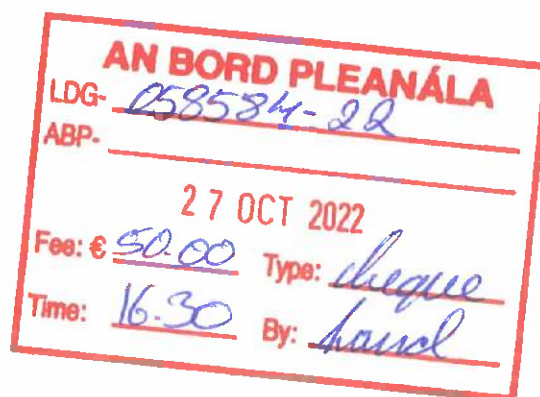
Currently, the club's senior team play in the Leinster Senior League Senior Division. They also regularly compete in the FAI Cup, the FAI Intermediate Cup, the FAI Junior Cup and the Leinster Senior Cup. In 2017, the club won the Leinster Senior League Senior Division for the first time. Whilst the club has two successful senior teams, the majority of the clubs 30 teams are at the grassroots schoolboys and girls' levels. With 3 teams coming out of our successful academy for 4 – 7-year-olds, the club then provides teams at all ages from Under 8 through to Senior level.

St Mochta's Football Club is an integral part of recreational space within Clonsilla, is already a prominent feature of the area which can be characterised as rural or edge of urban which goes some way to explaining how significant the proposed development will be in this environment. Without careful consideration of the implementation of the DART+ West Strategy, St Mochta's could potentially become an isolated recreational space, accommodating enhanced rail access but being severed from the community from which it comes.

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This submission aims to highlight the substantial risk the current proposals for the DART+ West Strategy represent to the viability and existence of the Club and aims to initiate constructive engagement with Irish Rail in relation to proposals contained within the draft Railway Order, so that the future of the club can be secured.

Hard work, commitment, and enterprise have taken the club to where it is now. St Mochta's are sensitive to ensure that progress is not lost with such an impactful and 'ground taking' proposal that is currently before the Board. They seek to ensure that dialogue is initiated to secure the future of the club in this location. Numbers at the club have surged in the last decade growing from just over 250 members in 15 teams to now in excess of 500 across 30 teams. In the last 5 years the club has gone from an all-male membership to over 50 female members including an all-female team. This focus on getting girls into football has blossomed as a result of hard work by our grassroots committee in tandem with the support the club has received from the Football Association of Ireland (FAI), the Union of European Football Associations (UEFA) and Disney by being selected as a centre for the prestigious UEFA Disney Playmakers Programme for girls aged 5 – 8.

### Site Context

The site forms part of a wider area subject to the Kellystown Local Area Plan objective of the County Development Plan, for a planned new residential neighbourhood. The Kellystown LAP 2021 was adopted in January 2021. The proposed development lies within 'Development Area 1' for early phase development at the eastern end of the LAP lands. The application site is bounded by Abbey Cottage (single storey) to the north. Porterstown Road, St Brigid's Lawn Traveller Accommodation and St Mochta's Football Club lie to the east.

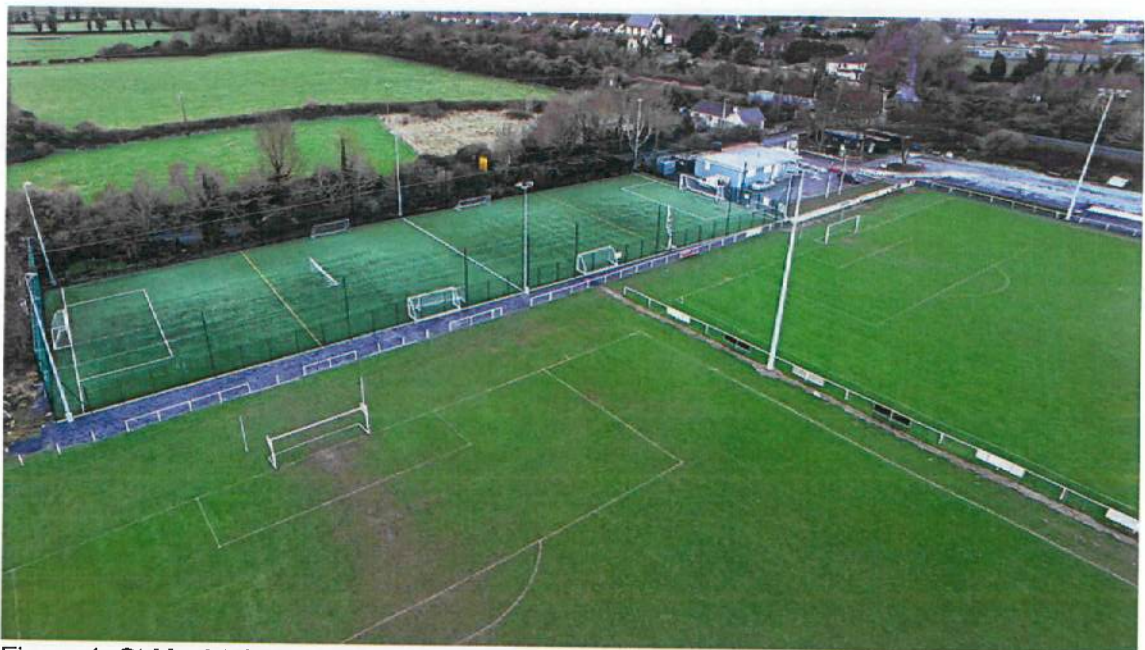


Figure 1: St Mochta's Football Club. Source: PST Sport.

The existing part of Kellystown Link Road and the Porterstown schools' campus lie to the south. Open lands lie to the southwest, west and northwest. East of Diswellstown Road overpass is the built-up housing area of Porterstown / Diswellstown.

The Royal Canal and Dublin- Maynooth(-Sligo) rail line lies to the north of the application site. The site is located within approximately 1.1km of both Coolmine and Clonsilla commuter



rail stations, to the east and west respectively. The NTA and Iarnród Éireann are seeking to upgrade this rail line from 2024 onwards. This includes the electrification of the line to allow for DART trains and more frequent and higher capacity services as part of the DART+ West Programme.

The preferred rail option in this location includes the closure of the level crossing and construction of a pedestrian and cyclist bridge over the rail line at Porterstown Road, to the north of the application site. No provision is made for a new train station at Porterstown. To the north of the rail line are Clonsilla and Blanchardstown. Clonsilla village, which includes a range of neighbourhood scale shops, is located approximately 500m to the north. Blanchardstown major town centre is approximately 2km to the north.

A short spur road (i.e. the initial section of the 'Kellystown Link Road') has been extended west from the junction of Diswellstown Road to serve the school campus, the cemetery access road and to connect with the existing Porterstown Road. The site is located c. 400m from the nearest Dublin Bus stop, located on Diswellstown Road to the east of this junction.

Figure 1 above illustrates the principal facilities that have been provided on site due to the hard work and vision of the club and its members. The majority of the land available to the club, under a remaining long lease from Fingal County Council, is taken up with pitches for which substantial external funding was captured, and which are currently in significant use by playing members. The area most affected by Irish Rail's current proposals before the Board lies to the northwest and which happens to comprise the entrance to the facilities and pitches, emergency access to the pitches, a long but narrow car park for use by parents, spectators and visiting teams. It should be noted that the car park offers the club the opportunity to provide off-street car parking and there is also a raised embankment in this location running alongside the principal pitch where spectators both from home and away clubs view matches. Spectator facilities are limited elsewhere within the grounds. The area to the uppermost right of Figure 1 also provides access to the Castlethorn Developments compound. Castlethorn are a significant, committed and long-term developer in the area. It should be noted that the principal source of income for the club, aside from membership, is from entrance fees at Senior matches and from selling tea/coffee at the club shop. There is a limited refreshment area and there is no bar or social club.

As indicated below the proposal as currently envisaged would obliterate elevated spectator viewing, remove a parking area to where it would be impractical to park in this area and would render the compound inaccessible for large construction vehicles.

### **Planning History**

The planning history of the subject site is confined to a single planning decision (shown Table 1 below). Adjacent, relevant planning histories have also been considered and are summarised below.





**Table 1: Subject Site Planning History**

<b>Subject Site</b>	
<b>Planning Reference Number</b>	FW12A/0048
<b>Date Received</b>	11 Dec 2012
<b>Proposed Development</b>	Permission granted by FCC on 21 February 2013 for the development of 1) Construction of an all-weather soccer pitch (90m x 30m) adjacent to existing cabin changing facilities with 2.4m high perimeter fencing and additional 3.6m high ball stop netting above (6m overall height). Pitch flood lighting in the form of 6 no. 12m high columns with a total of 12 no. light fittings. 2) Pitch flood lighting to existing 100m x 60m senior grass pitch in the form of 6 no. 15m high columns with a total of 24 no. light fittings along with 6 no. light fittings facing the adjacent existing grass pitch. 3) And all associated site works.
<b>Decision</b>	21 February 2013 FCC GRANT
<b>Planning Reference Number</b>	F01A/0622
<b>Date Received</b>	25 May 2001
<b>Proposed Development</b>	Permission refused by FCC on 16 August 2001 for the development of a 20 metre Monopole Antennae Support structure carrying GSM Telecommunications equipment, flood lighting equipment, associated equipment container and palisade fencing.
<b>Decision</b>	16 August 2001 FCC REFUSE
<b>Planning Reference Number</b>	F99A/0652
<b>Date Received</b>	01 Jun 1999
<b>Proposed Development</b>	Permission granted by FCC on 7 October 1999 for the development of community sports facility at Porterstown Road, Clonsilla, Dublin 15 by St. Mochta's F.C. Community Sports Centre. The facility to include changing areas, lounge, bar, on site car parking, all associated site works. According to information on the FCC interactive map it would appear that this development was not completed.
<b>Decision</b>	26 Aug 1999 FCC GRANT

The above indicates ongoing development and investment in club facilities over a period of 20 plus years (since the initial 1999 permission identified in the table above). This must not be laid to waste by the current proposal. On a broader perspective of the site, on the northern side of the tracks an SHD application was lodged for 198 no. apartments, childcare facilities, and associated site works (ABP Ref. 309622) at the Old School House Site (a protected structure). However, that application was refused by ABP on 28/06/2021.

### **Planning Policy**

There are several national and regional planning policies and objectives, set out below, that support the club's view that impact upon their amenities and facilities, should be minimised, and that land loss to accommodate the proposed development in this instance should be reduced to the absolute minimum and the integrity of the club's facilities maintained.





## **National Level Policy**

### ***National Planning Framework***

The NPF acknowledges the importance of providing a range of land uses well located to the populations they serve and recognises the benefit of providing open space, recreation and sports provision, in close proximity to where people live, so that a high quality of living can be provided for the State's citizens. Therefore, in the case of St Mochta's this national policy advocates support and enhancement to local facilities within easy reach of local populations which certainly applies in this case. This is complementary to other Government policy that encourages healthy living and active lifestyles including, it is acknowledged, the promotion of active modes of transport. (Section 6.2 of the NPF 'Healthy Communities' refers). National Policy Objective 26 also seeks to integrate and ensure compatibility of national health policy including 'Healthy Ireland' and the 'National Physical Activity Plan'.

The NPF identifies on page 88 that *'The continued provision and enhancement of facilities and amenities for children and young people, such as childcare, schools, playgrounds, parks and sportsgrounds, remains necessary and will need to be maintained at similar levels for the foreseeable future thereafter.'*

## **Regional Policy**

### ***The Eastern and Midlands Regional Assembly Regional Spatial and Economic Strategy***

The Eastern and Midlands Regional Assembly Regional Strategic and Economic Strategy (EMRA RSES) covers the application site. This RSES seeks to build in the NPF by encouraging development into existing settlements and centres (including we believe specially designated centres including the NSC) and thereby into sustainable locations where return on infrastructural investment approved and set out in the National Development Plan (NDP) can be maximised and where one of the pillars of the NPF can be achieved namely compact urban development and productive and sustainable use of active sites, as in this instance.

A Guiding Principle under 'Quality of Life' states that:

*'In planning for recreation and open space local authorities should follow these Guiding Principles:*

- Facilitate a sufficient supply of good quality sports and recreation facilities, including networks for walking, cycling and other activities and shall maximise the multiple use of such facilities by encouraging the co-location of services between sports providers, schools, colleges and other community facilities.*
- Support play policies to address the play and recreation needs of children and young people and ensure the integration of play provision and child-friendly neighbourhoods.*
- Provide for the development of dedicated youth spaces in key urban areas and the development of multifunction spaces in smaller communities / rural areas.'*

There is a strong focus on planning for a healthy population and providing healthy, sustainable, and high-quality places. Regional Strategic Objective No. 4 states that it is a strategic objective in regard to 'Healthy Communities' to:



*'Protect and enhance the quality of our built and natural environment to support active lifestyles including walking and cycling, ensure clean air and water for all and quality healthcare and services that support human health.'*

There are several regional policy objectives for sport, recreation and open space directly relevant to this case. These include the following:

*'RPO 9.14: Local authorities shall seek to support the planned provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve.'*

*RPO 9.15: Local authorities shall support the vision and objectives of the National Sports Policy, including working with local sports partnerships, clubs, communities and partnerships within and beyond sport, to increase sport and physical activity participation levels locally.'*

*RPO 9.16: Local authorities shall support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policies contained in development plans.'*

*RPO 9.17: To support local authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the Region.'*

The RSES recognises the recreational offering of the metropolitan area and makes the link between recreation and tourism and also the link between recreation and culture and heritage including not only the State's natural heritage but also its built heritage. Recognition is also given to the importance of ensuring that sufficient open space and recreational opportunities are provided for population growth over the lifetime of these guidelines. The importance of open space and recreational opportunities are also emphasised in the creation of healthy place making (Figure 9.2 Healthy Placemaking Strategy refers).

Chapter 9 (Healthy Places) of the RSES states that *'The key principle of healthy placemaking is the driver for this chapter to deliver on a number of the Regional Strategic Outcomes on compact growth, regeneration, integrated transport and land use, rural development, human health and creative places to create healthy and attractive places, to improve our quality of life. The availability of, and access to, services is key to creating healthier places. This includes access to adequate housing and employment choice, supported by good healthcare and education, quality public realm and access to nature, the arts and cultural heritage.'* The proposed development, as currently presented, would irreparably damage the integrity of the clubs facilities and should be considered contrary to regional planning policy set out above.

The above recreation, sports and leisure policies and objectives should be given equal footing as national transport and access policy and guidance and advocates the retention of the existing facilities provided and run for the local community by St Mochta's and advocates the retention of these important and well used local sports facilities substantially as is and without significant impact, which is clearly not the case as currently proposed.

#### **Local Planning Policy**

##### ***Kellystown Local Area Plan 2021***

The Kellystown LAP makes reference to the DART+ West proposals and recognizes 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 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.

The LAP advocates the longer-term relocation of St Mochta's as set out below:

*"The LAP aims to relocate St. Mochta's Football Club to a new location. The new site will accommodate a full-sized soccer pitch along with new sports facilities in the form of multi-use games areas (MUGAs) which will be accessible by the new schools. The relocation of St. Mochta's Football Club will facilitate the development of residential units within Development Area 1."*

Within the LAP there is no timeline given for this relocation. The club is of the view that the inclusion of its relocation as an objective in the LAP does not in any way guarantee that such a relocation will occur over the lifetime of this or the next LAP (a period of 10-15 years) which means that the club will be saddled with the impact of the proposed development for at least a full decade and probably more.

### **The Proposed Development**

The proposed works involves the construction of a new cycle/pedestrian bridge over the railway and canal. The provision of the new bridge will facilitate the closure of the level crossing but would require diversion of traffic to surrounding crossings of the railway. No improvements to the surrounding road network are proposed. Localised reconfiguration of the road network at the level crossing is proposed to provide vehicle turning facilities and passenger drop off.

The proposed design provides for a mini roundabout to the north and a turning head to the south of the existing level crossing. To the north of the existing level crossing, access is provided to the Old Porterstown Schoolhouse lands which are due for residential development. Access will also be provided to the existing farmhouses to the east of Porterstown Road. A mini roundabout with an inscribed circle diameter of 16 m is provided as per the Greater Dublin Area Cycle Network Plan.

#### *Pedestrian and cycle bridge*

A two-span pedestrian, cycle and mobility impaired bridge is proposed over the canal and railway. The main spans will be 30.9 m and 24.5 m in length measured to pier support centre lines. The elevated portions of the superstructure will be cast integrally into the crosshead over pier supports. The main span of the bridge will comprise precast W8 beams with composite precast slab units. The ramped approach to the north and south above the level of the 180-degree turn will consist of precast W5 beam spans with an in-situ deck, while the ramped approaches below the 180-degree turn will consist of a reinforced earth/retaining wall structure. The stairway access to the bridge will be of precast concrete construction, with the intermediate landings being constructed in-situ. The general arrangement of the bridge is to allow vehicles to drop off and turn back north. To the south of the crossing, a





turning head has been provided for turning manoeuvres to allow vehicles to drop off and turn back south. This turning head notional provides access to the existing St Mochta's Football Club grounds although substantially more constrained in the view of the club than what exists on site currently. The proposal will have a major impact on how our clients facilities will be secured and accessed, resulting most likely in two accesses having to be provided with one to the clubhouse, for deliveries, and emergency access, and the other to the pitches.

#### *Porterstown Level Crossing*

On the northern side of the level crossing, following completion of the works, the Porterstown Road will become a cul-de-sac. A mini roundabout will be provided to allow vehicles to turn back north. On the western side of the roundabout, an arm will be provided to allow access to the Old Schoolhouse lands which is subject to an ABP SHD proposal. On the eastern side of the roundabout, the existing access to a private residence will be altered and new access provided off the roundabout. A new 1.8 m footpath will be provided along the eastern side of the roadway and an uncontrolled crossing provided on the southern side of The Village housing estate.

On the southern side of the level crossing, following completion of the works, the Porterstown Road will become a dead end. The area immediately south of the level crossing, around the entrance to the over bridge steps and ramp to the over bridge will be paved. The level crossing will be gated to stop unauthorised access to the rail line while maintaining access by CIÉ for maintenance. Vehicles will be provided with a hammerhead to allow them to turn back south. A new entrance and gate into St. Mochta's football club will be provided.

#### *Temporary Carpark*

A significant feature of the proposed development currently before the Board is the temporary car park.

*"On the southern side of the level crossing, following completion of the works, the Porterstown Road will become a dead end. The area immediately south of the level crossing, around the entrance to the overbridge steps and ramp to the overbridge will be paved. The level crossing will be gated to stop unauthorised access to the rail line while maintaining access by CIÉ for maintenance. Vehicles will be provided with a hammerhead to allow them to turn back south. A new entrance and gate into St. Mochta's football club will be provided."*

As Castlethorn are included in the Rail Order, they may be obliged to provide the temporary access from the south during the construction phase.

The above works and development are considered substantial, occupy a large, and in our client's view require a clearly excessive amount of land, to be taken up by the proposal. In our view this can be substantially reduced to adequately and safely serve the intended purpose which is not in dispute by the club but can be less impactful if modified, reduced, or preferably relocated. Our client's preferred position is that the pedestrian and cycle ramp is relocated to the other side of Porterstown Road.

#### *Construction duration*

Work duration for the level crossing closure and the bridge construction is estimated around 12 to 14 months as presented in the application documents submitted to An Bord Pleanála.

It is stated in the application documents submitted that the level crossing will be closed after finishing the pedestrian bridge, that way, the pedestrian, and cyclist accessibility will not be



affected by the different stages of the construction, keeping a crossing option always available. Section 5.6.18.5 of the submitted EIAR identifies that construction compounds and haulage routes are to be located across both sides of the Royal Canal, in Porterstown. The compound located to the south of the railway will act as the main compound and include plant/machinery/material storage and office and welfare facilities. The compound to the north of the railway will store materials for short durations as required for the works. Construction related vehicles will access the compounds via the N4, R843 and R121, as shown in Figure 5-273.

### **Acceptance by the Application of local and substantial impact**

The applicant in their EIAR acknowledges the significant impact of the proposed development on the local environment, including St Mochta's, and in other instances substantially understates that impact. The key impacts acknowledged in the submitted application include the following:

- Construction of a new cycle and pedestrian bridge at Porterstown Level Crossing will involve substantial works and the introduction of a large, engineered structure into a rural / urban fringe landscape.
- Localised disturbance of the landscape character and introduction of visual clutter and activity will impact on the amenity of sensitive landscape receptors such as the Royal Canal (see Section 15.5.1.2.5) and protected structures (See Section 15.5.1.2.4).
- Loss of trees and landscape areas as part of the changes to junctions on Diswellstown Road.
- Sensitivity of the streetscape / townscape character in the vicinity of Porterstown is 'medium' / 'high'. The magnitude of change will be high and the likely effects in the construction phase will be significant, negative, temporary / short-term.

It is further indicated by way of understating impact to the club that in terms of the bridge, that:

*'Works will result in indirect impacts on St. Mochta's Football Club for construction of the new bridge at Porterstown. There will be loss of hardstanding / parking areas. The sensitivity is 'medium' and the magnitude of change is 'medium'. The likely townscape / streetscape and visual effects of the construction phase on the amenity of St. Mochta's football club is moderate, negative, short-term.'*

We believe the impact identified above to be more substantial than indicated immediately above. However, it is acknowledged in the submitted EIAR that:

*'There will be permanent land take from St. Mochta's football club for provision of the new bridge at Porterstown. There will be loss of hardstanding / parking areas. The sensitivity is 'medium' and the magnitude of change is 'medium'. The likely townscape / streetscape and visual effects of the operational phase on the amenity of St. Mochta's football club moderate, negative, short-term and slight, negative, long-term.'*

We would have two additional criticisms of the EIAR, the first relates to impact on health which is largely ignored in the EIAR. The second is the disruption caused during the construction to club activity.



### **Our Planning Based Concerns**

The following points are of most concern to our client:

- The proposed new cycle and pedestrian bridge is over scaled and results in excessive and unnecessary land take;
- Whilst providing increased access to enhanced rail infrastructure the development as currently proposed may result in severance of the club's facility from its community and associated catchment;
- The proposal severely comprises the viability of the existing sports facilities in this location;
- The impact of the proposed development is more significant than that stated in the submitted EIAR;
- Negative impact upon health;
- The loss of sporting facilities and amenities and diminished use is contrary to national and regional planning policy and guidance.

Our comments on these issues are as follows:

*The proposed new cycle and pedestrian bridge is over scaled and results in excessive and unnecessary land take*

The proposed cycle and pedestrian bridge at the point that it intrudes into the subject lands is clearly over scaled for the purpose to which it is provided. The width, diameters and length of the ramp is clearly excessive (see Transport Insight accompanying this document for further details and measurements). The remaining land between the ramp and the pitch side is sufficiently narrow to prevent any meaningful use of this area – certainly too narrow to retain a row of car parking and too narrow to permit continued use of the remaining strip of land to facilitate continued vehicular access to the Castlethorn Developments construction compound.

*Whilst providing increased access to enhanced rail infrastructure the development as currently proposed may result in severance of the club's facility from its community and associated catchment*

It is somewhat ironic that a facility that will enhance access the public transport to the area from locations further afield will, in fact, sever the club from its community. This will occur since the ability for people to access the facility via private vehicles will be greatly diminished. For those travelling to the ground on coaches this facility has been greatly diminished and it is clear that coaches would no longer have access to these grounds given the lands proposed to be taken by Irish Rail at the entrance and once inside the ground by the removal of parking so that there is no remaining area suitable for the parking of coaches without having to lose at least one pitch or playing area. As indicated in the Transport Insights accompanying submission the loss of parking results in considerable loss of income to the club and the only way that parking can be reinstated would be if a pitch were lost to provide parking elsewhere within the grounds. That in itself would result in loss of income as there would be one further pitch lost and the revenue from matches on it would also be lost. The club therefore is in a 'no win' situation as far as revenue is concerned. This is not considered in the submitted application nor in the accompanying EIAR.

*The proposal severely comprises the viability of the existing sports facilities in this location*

As indicated above the proposed development at this location is a massive intrusion to the operation and enjoyment of the existing facilities which would severely jeopardise the





viability of the club going forward (i.e. the loss of parking and potentially the loss of a pitch to compensate for this). This would mean that the sporting facilities and sporting needs of the area would be greatly diminished.

*The impact of the proposed development is more significant than that stated in the submitted EIAR*

The proposed development is in a largely rural location and the proposed structure, excessively scaled as it is, will be visually obtrusive when set against a playing pitch environment with little by way of built form. The impact upon the landscape is therefore one of high significance rather than of medium significance as indicated in the submitted EIAR.

There is also the prospect of overlooking into the club's premises and the potential for members of the public not to pay their way in to watch matches with the resulting loss of revenue to the club as indicated elsewhere.

*Negative impact upon health*

It is also highly ironic that the promotion of active modes of transport in this location will diminish the provision, use and enjoyment of a key piece of sporting infrastructure for the local community, which in itself will diminish indirectly the health and wellbeing of the local community. This not acknowledged in the submitted EIAR and we feel that this should be addressed by the applicant.

*The loss of sporting facilities and amenities and diminished use is contrary to national and regional planning policy and guidance*

The proposal is contrary to national and regional planning policy as indicated above, namely that a balanced range of uses should be provided in the maintenance and creation of quality and sustainable places and that sports and recreational facilities should be maintained, protected and where possible enhanced. Section 6.2 of the NPF 'Healthy Communities' refers. National Policy Objective 26 within the NPF seeks to integrate and ensure compatibility of national health policy including 'Healthy Ireland' and the 'National Physical Activity Plan' and the proposal would be contrary to this.

The NPF identifies on page 88 that *'The continued provision and enhancement of facilities and amenities for children and young people, such as childcare, schools, playgrounds, parks and sportsgrounds, remains necessary and will need to be maintained at similar levels for the foreseeable future thereafter.'*

The proposed development within St Mochta's grounds is also contrary to regional planning policy set out in the relevant RSES, as indicated above, as it would deny to the local community a *'sufficient supply of good quality sports and recreation facilities'*. The Board will be aware that greater awareness and provision of facilities is being given within the planning system for younger people and children in particular so that they grow up in a stimulating and high-quality environment.

### **Transport and Development Concerns raised by Transport Insights**

The accompanying Transport Insights submission documents the access and development concerns of the proposed development. The key points are summarised below.



#### *Vehicle Security*

It is noted that security of cars and their contents is an on-going issue. Vehicles currently parked at the Club's car park benefit from passive surveillance from spectators watching matches pitch-side as the car park abuts the senior pitch. As the proposed carpark will no longer be adjacent to the pitches, this is of concern to the Club, further exacerbating concerns around security of vehicles and their contents belonging to spectators, visitors, staff and players.

#### *Car parking*

The entire southern side of the proposed ramp is located completely within St Mochta's existing car park. All car parking for the club will be lost following the construction. Teams travelling from areas within the Greater Dublin Area may not be directly linked by public transport. It must be noted the current car park is at full capacity 5-6 times per week. Provided that the car park will be removed in the proposal, the overspill of car parking onto the nearby estate would be highly unfavourable for the residents nearby with likely associated traffic hazards arising.

#### *Club Revenue Impact*

The Club is part financed from the revenue generated by matchday supporters who pay a small fee to attend matches. If there is no parking available for these spectators, it is likely that this would deter supporters from attending when no parking is provided. This will substantially reduce revenue for the club.

#### *Site Security*

The boundary of the grounds will need to be redrawn following implementation of the ramp. It is anticipated that this will be an issue regarding site security. As the incline of the ramp appears modest, preventing direct access from the ramp into the grounds will need to be considered.

#### *Fire Tender/ Ambulance Access*

From the proposal it is currently unclear how fire tender and ambulance access shall be maintained following implementation of the ramp proposals, and this is a significant concern of St. Mochta's FC.

#### *Loss of Community Amenity*

The club facilities provide a key social and community function as evidenced from programmes such as Little Saints Academy for young children.

The above are considered to be significant concerns to the club and its future viability.

### **Conclusion**

St. Mochta's believes that the aims of the DART+ West proposals can be achieved without the need to impact so significantly on the operation of the Club.

The preferred option for the club is for the proposed pedestrian and cycle ramp to be relocated to the northern side of Porterstown Road. Lastly, the establishment of a temporary car park during the construction period should be arranged to mitigate against the impact that the construction phase will have on the club, with costs to be borne by Irish Rail.

The above proposed suggestions show that St. Mochtas FC are willing and open to work with relevant stakeholders to support realisation of the DART+ West programme, however,



also allow for the Club to remain commercially and operationally viable and continue to provide a significant and notable contribution to the local community.

We would ask you to consider whether a temporary car park could be provided and conditioned as a requirement to consent being granted for the construction period.

We trust you will give detailed consideration to the contents of this Submission. St. Mochta's FC looks forward to further engaging with relevant stakeholders in the months ahead as the DART+ West scheme is refined.

Yours sincerely,



Eamonn Prenter  
Director  
**CUNNANE STRATTON REYNOLDS**





An Bord Pleanála  
64 Marlborough Street  
Dublin 1, D01 V902

26 October 2022

**Our Ref:** DART+ West – St. Mochtas FC Draft Railway Order Submission

**Your Ref:** DART+ West Electrified Railway Order 2022

Dear Sir or Madam,

On behalf of our Client, St. Mochtas FC (St. Mochtas FC, Porterstown Road, Clonsilla, Dublin 15), Transport Insights welcomes the opportunity to provide An Bord Pleanála with a Transport Submission in respect of the draft Railway Order for the development of DART+ West. This Submission has been drafted by Transport Insights, with planning and policy support from Cunnane Stratton Reynolds Planning Consultants.

In light of the significant social and community function provided by St. Mochtas FC, and the substantial risk the current DART+ West proposals represent to the viability and future of the Club, our Client trusts you will give detailed consideration to the contents of this Submission. They look forward to constructively engaging with all stakeholders in relation to proposals contained within the draft Railway Order and the updated scheme as it is progressed in the months ahead. The Club will welcome the opportunity to present their concerns at the anticipated Oral Hearing of An Bord Pleanála, likely to be in 2023.

### St. Mochtas FC

St. Mochtas FC is an association football club located in Clonsilla, Dublin 15. The Club was established in 1949, has 32 teams across all age groups (boys and girls), and the senior team currently plays in the Leinster Senior League, Senior Division. There are over 500 registered football players with the Club. Over a typical weekend there would be ca. 16 no. matches played at the club's Clonsilla grounds over Saturday and Sunday. Weekday matches are also played on some weekday evenings. The Club provides a large number of youth and child training programmes including *Little Saints Academy* for young children between the ages of 4 and 7.

The Club's grounds at Clonsilla are laid out with car parking facilities provided along the northern side of the site and football pitches provided at the centre and southern parts of the site. Car parking



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facilities are critical for travelling away fans in particular due to typical distances travelled and the lack of any on-street car parking in the vicinity of the Club.

The first team pitch is located directly to the south of the car park, with a second pitch located adjacent to the south and a long linear Astro turf pitch to the west. Further to the south are 2 no. 5-side grass pitches and a 7/9-side pitch, both of which are adjacent to the southern boundary of the Club grounds. Changing rooms, toilet facilities, a shop and equipment stores are all located along the western boundary of the site, north of the Astro pitch. Vehicular and pedestrian access/ egress are both via a single gated access from L3035 Porterstown Road at the north western corner of the site, which provides direct access to the site for all vehicles, deliveries, emergency vehicles etc.

**Figure 1 St. Mochtas FC Club Grounds**



**CSR St. Mochtas FC DART+ West Submission**  
St. Mochtas FC Club Grounds

The Maynooth Railway Line adjoins the northern boundary of the site and L3035 Porterstown Road adjoins the western boundary of the site. St. Brigid's Lawn, a small residential development is located at the southwest of the site. A brownfield site (part of which is used by the club as an overflow car park) and L3036 Diswellstown Road adjoins the eastern boundary of the grounds. The Club grounds are operated under leasehold from Fingal County Council on a 35-year lease, of which there are 28 years remaining. It is noted that the car park area and overflow car park do not form part of the lease with Fingal County Council and are in the ownership of Castlethorn Developments.

The following Figure 2 illustrates the Club's car park with Figure 3 illustrating the site's location and layout.



Figure 2 St. Mochtas FC Car Park

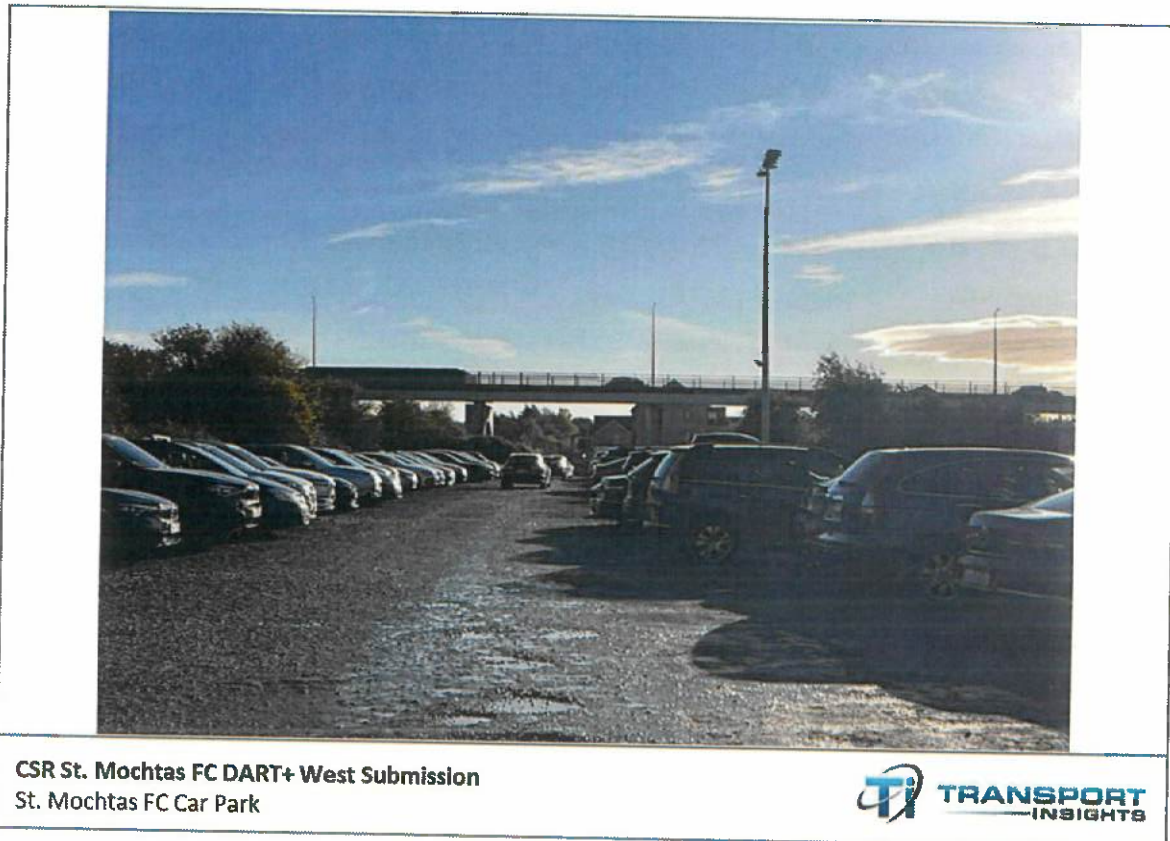


Figure 3 St. Mochtas FC Grounds Location and Layout





### **National, Regional and Local Planning Policy Background**

As part of Project Ireland 2040 the *National Development Plan 2021-2030* sets out the Government's overarching investment strategy and budget for the period 2021-2030. According to the *Plan*, *"The DART+ programme will be a cornerstone of rail investment within the lifetime of Project Ireland 2040 and represents the single biggest investment in the Irish rail network."*

The *Greater Dublin Area Transport Strategy 2022-2042* provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area between now and 2042. The DART+ programme is a major component of the *Transport Strategy* and includes electrification of the Maynooth line from Dublin City Centre to Maynooth, elimination of level crossings and new grade-separated pedestrian, cycle and vehicle crossings.

The *Draft Fingal Development Plan 2023-2029* has not yet come into effect, however makes reference to the *Transport Strategy* where it states it commits fully to the existing transformative public transport projects including DART+. The *Plan* states that significant investment is planned for Fingal and particularly as it relates to the corridor connecting Fingal and Dublin City Centre which includes... *"implementation of the DART Expansion Programme which proposes the provision of high frequency DART services including the electrification of the existing Maynooth and M3 Parkway rail lines and the northern rail line to Drogheda."*

St. Mochtas FC recognises and supports the role of DART+ West in achieving the ambitions of critical national, regional and local planning policy.

### **Receiving Environment**

St. Mochtas FC is located on L3035 Porterstown Road, a narrow two-way local road, ca. 5.0 metres wide generally however narrowing to ca. 4.5 metres in places, which connects R121 Clonsilla Road to the north with L3036 Porterstown Link Road to the southeast. In the vicinity of the site, Porterstown Road is ca. 5.0 metres wide and has a ca. 1.5-metre-wide footpath located on the western side of the road. An at grade '*level crossing*' provides access over the Maynooth Railway Line, located adjacent to the north of the site. Directly beyond the level crossing is a narrow bridge over the Royal Canal.

L3035 Porterstown Road has a generally flat vertical alignment, however features a number of changes to its horizontal alignment throughout its length. No parking restrictions are present on Porterstown Road. Street lighting is present and a 50 kph speed limit is in place. Figure 2 which follows illustrates Porterstown Road in the vicinity of the site (the boundary of the Club grounds is on the left hand side of the photograph).



Figure 2 L3035 Porterstown Road



CSR St. Mochtas FC DART+ West Submission  
L3035 Porterstown Road

### DART+ West Proposals

DART+ West proposals involve electrification of the Maynooth line to accommodate a new frequent, high-capacity train service. To accommodate delivery of DART+ West, it is proposed to close the level crossing on Porterstown Road. As a result, no through vehicular traffic shall be possible. Pedestrian and cyclist traffic shall be accommodated via a new ramp and bridge which will connect the northern and southern sides of the railway line. The proposed ramp and bridge are 5.0 metres wide and feature a series of landings along its length. An exaggerated bend halfway down the ramp is also included. A separate stair is proposed at each side of the crossing. The following Figure 3 illustrates the current DART+ West proposals in the context of St. Mochtas FC grounds.

Figure 3 DART+ West Proposals



As can be seen from Figure 3 above, the ramp on the southern side of the railway shall be constructed entirely within the St. Mochtas FC grounds, where the existing car park is located. Access to the existing car park shall be removed and vehicular access to the grounds will be limited to a stub with a turning head. The ramp shall also terminate within the Club grounds, with new access and security arrangements assumed to be required as a result.

#### Draft Rail Order Identified Concerns

Whilst St. Mochtas FC are supportive of DART+ West in principle and recognise the wider benefits it will bring, specific proposals contained within the draft Rail Order are deeply concerning to the Club for the following reasons.

- Car Parking:** The southern side of the proposed ramp is located completely within the Club's existing car parking area. As a result, all car parking at the club shall be lost during and following construction of the scheme. This is deeply concerning for the club as there is no suitable on-street car parking in the vicinity of the Club. Although the Club represents a local amenity, it also needs to accommodate away teams travelling to the grounds for matches. These teams travel from around the Greater Dublin Area and may not be directly linked by public transport or may be located too far away for public transport to represent a viable means of access. The car park is full 5 to 6 times per week (7 times if a seniors' match occurs on a Friday) and this is simply nowhere for that parking to be provided on-site without losing an existing pitch. Losing a further pitch would come at a time for the Club when further pitches are needed, not less. The Club has





already invested heavily in their pitches which along with its members/players are the cornerstone of the Club. It should also be noted that the Club uses public pitches elsewhere due to the volume of games played.

- Furthermore, as the Club accommodates all age groups, active travel by younger children and families may not be safe or desirable. Porterstown Road is narrow (ca. 5.0 metres wide) and should vehicles be forced to park on the road, it would likely constitute a traffic hazard due to the road's substandard width and alignment. Two-way vehicle movements would also potentially not be possible, however as the level-crossing on Porterstown Road is to be closed as part of the proposals, there would be no opportunity to implement a one-way traffic system.

Finally, the overspill of car parking onto nearby residential estates would be highly undesirable, with likely associated traffic hazards arising from same. In order to accommodate or replace car parking lost it would be necessary to lose an existing pitch to accommodate parking. The Club is however not in a position to lose a pitch due to significant demand for pitches. In short, no alternative car parking facilities are available in the vicinity of the site. Irish Rail has accepted in prior discussions with the Club that the design scheme currently presented is capable of being modified whilst still achieving Irish Rail's objectives at this location.

- **Club Revenue Impact:** The on-going operations of the Club are in part financed from revenue generated by matchday spectators, who contribute a small fee for a ticket to matches. The attractiveness and/or viability for spectators to travel to the site when no car parking is provided would be greatly reduced. Furthermore, the Club is concerned that following construction of the ramp, due to its elevated position above the first team pitch and its long length, spectators will instead view matches from the ramp having parked elsewhere, as opposed to viewing games pitch-side. This has the potential to significantly undermine the commercial viability of the Club from lack of use of Club shop for refreshments, purchasing of tickets etc.
- **Loss of Community Amenity:** Further to the abovementioned loss of car parking and reduction in Club revenue, a direct and associated loss of community amenity will result from the proposals. The Club provide a key social and community function as evidenced from programmes, such as the *Little Saints Academy* for young children, which rely on ease of access to car parking within Club grounds and funding from the Club.
- **Vehicle Security:** Vehicles currently parked at the Club's car park benefit from passive surveillance from spectators watching matches pitch-side as the car park abuts the senior pitch. It is however noted that security of cars and their contents is an on-going issue. Although there is no appropriate area immediately in the vicinity of the Club to park cars, it is assumed that car parking previously provided by the Club would be relocated to residential roads in Clonsilla. This is of concern to the Club, further exacerbating concerns around security of vehicles and their contents belonging to spectators, visitors, staff and players.
- **Site Security:** In addition to security associated with cars and belongings, securing the site is also anticipated to be an issue. The new ramp appears to terminate within the Club grounds. It therefore appears as though the boundary of the grounds will need to be redrawn following implementation of the ramp. Furthermore, as the incline of the ramp appears modest, preventing direct access from the ramp into the grounds will need to be considered.
- **Fire Tender/ Ambulance Access:** It is clear that fire tender and ambulance access shall not be capable of being maintained following implementation of the ramp proposals, and this is a concern of St. Mochtas FC.

- **Construction Compound Access:** The existing construction compound to the east of the site (which also acts as an overflow car park for the Club) currently owned by Castlethorn Developments is effectively sterilised for future use should the Club remain in situ by not having sufficient room between the edges of the ramp currently proposed and the edge of the nearest pitch to accommodate construction vehicle access.

### Summary and Outcome Sought

This Transport Submission has been prepared by Transport Insights, with support from Cunnane Stratton Reynolds Planning Consultants on behalf of St. Mochtas FC. It details potential points of consideration for An Bord Pleanála regarding the draft Railway Order. Prioritising sustainable travel and associated infrastructure is considered essential to achieving stated national, regional and local planning policy objectives.

However, proposals contained within the draft Railway Order represent a significant risk to the on-going operation of and future St. Mochtas FC. In particular, the complete removal of on-site car parking will result in an unacceptable impact to the Club, with highly undesirable overspill car parking representing inconvenience and road safety concerns.

St. Mochtas believes that the aims of the DART+ West proposals can be achieved without the need to impact significantly on the operation of the Club. The Club regrets that there was no prior engagement with it from Fingal County Council or Irish Rail prior to the public display of the proposed facilities the subject of the Order in question. However, they do wish to work with Irish Rail to come up with an optimal solution that would be acceptable to both parties. The Club also are very supportive of DART+ West, which will be of great benefit to the local community, of which they are an integral part. They request that the proposed ramp is redesigned with two potential options to reduce the land take required as set out as follows.

- The Club's preferred option would be to have the pedestrian and cyclist access to the south of the railway line on the other side of Porterstown Road instead of spreading the impact over two locations on either side of the main road. The existing residence would likely have to be subject to a compulsory purchase order to help this to occur.
- A second, but less preferred option for the Club, would be to reduce the dimensions and footprint of the proposed ramp, thereby reducing the land take required from the Club. For instance, the ramp could be reduced from 5.0 to 3.0 metres wide (which is the typical standard of a Greenway that also accommodates two-way cycle and pedestrian movements) and the exaggerated bend halfway down the ramp could be removed so that access to existing car park can be retained, albeit with some loss of car parking on-site.
- Finally, a third option could be to mirror the ramp on the car park area to bring the higher section close to the pitch side and lower section closer to rail line side. The ramp can then discharge onto Porterstown Road directly. A reduction of ramp width will further help on this.

A sketch of the above arrangements (second and third bullet points) is provided at Figure 4 and Figure 5, which follow.

Figure 4 Sketch of Ramp Redesign (Second Option)

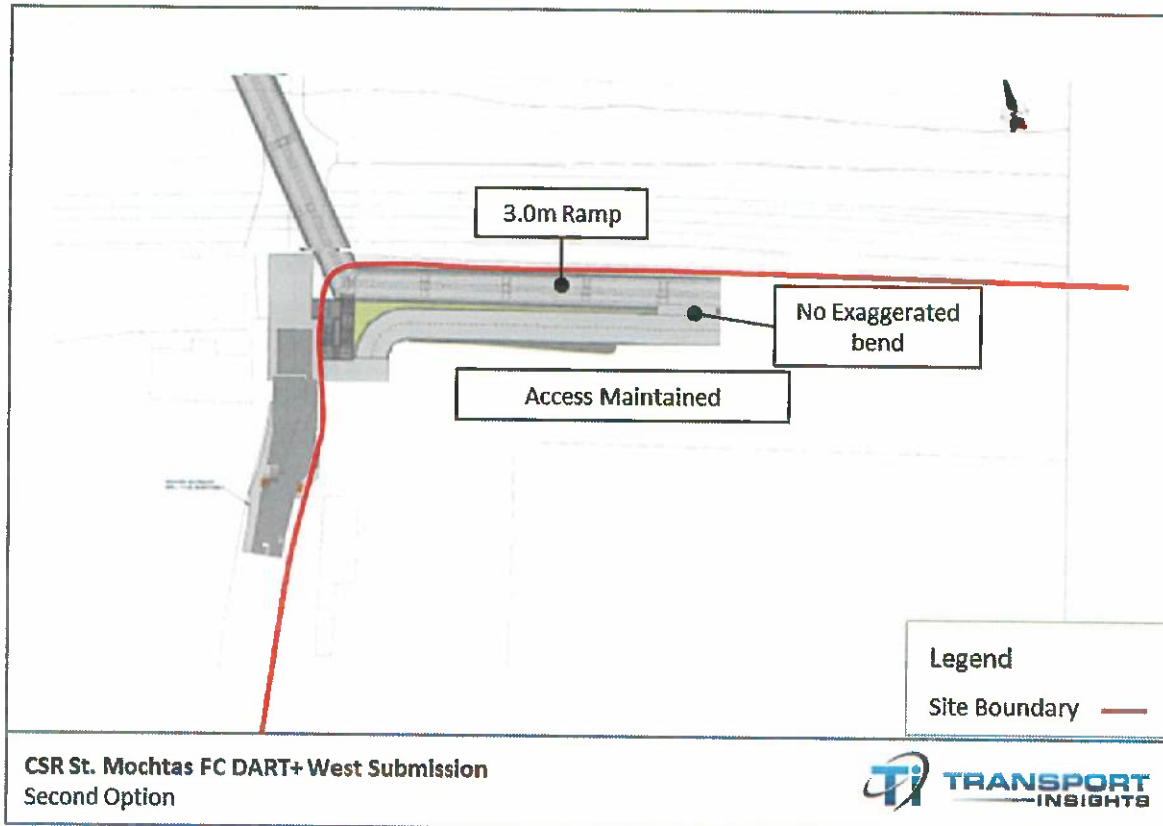
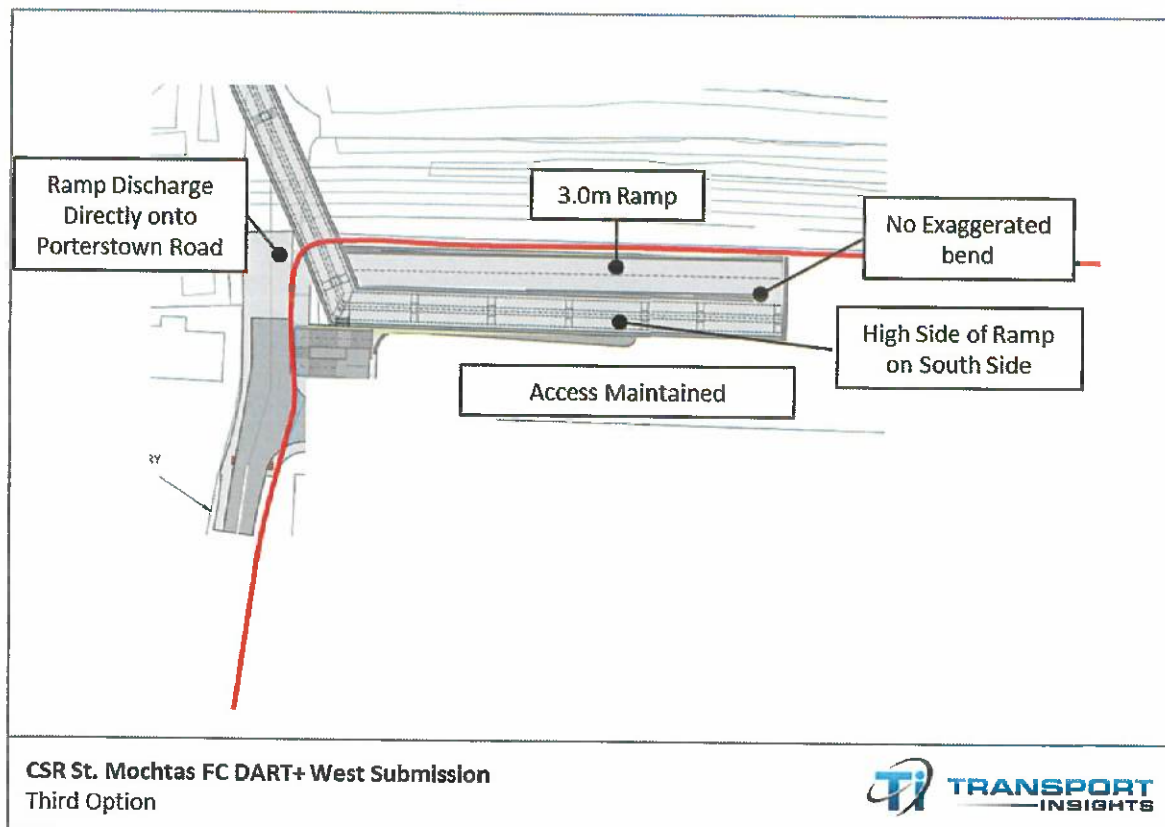


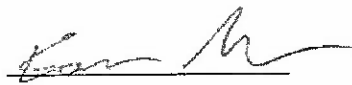
Figure 5 Sketch of Ramp Redesign (Third Option)



The above proposed suggestions show that St. Mochtas FC are willing and open to work with relevant stakeholders to support realisation of the DART+ West programme, however also allow for the Club to remain commercially and operationally viable and continue to provide a significant and notable contribution to the local community.

We trust An Bord Pleanála will give detailed consideration to the contents of this Submission. St. Mochtas FC looks forward to further engaging with relevant stakeholders in the months ahead in order to arrive at an acceptable solution for all parties.

Yours sincerely,



**Eoin Munn**  
**Director**