

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

**Online Submission  
28.10.22**

**Re: "DART+ West Electrified Railway Order 2022"**

### **Introduction**

I have attended Ashtown Stables, Ashtown, Dublin 15 for many years. I have strong concerns the impact that the Dart West plans will have on Ashtown Stables. I don't understand how Irish Rail believe that a horse riding stables can operate while there is a construction site surrounding it. I don't understand how Irish Rail anticipate for the stables to remain operable considering they are taking crucial land from the horses. The stables require all the land at Ashtown that they are operating on. Every piece of the land at Ashtown Stables serves an important purpose for the horses. The current plans to remove field space from the horses is barbaric. The number of fields the stables have is critical for rotation to ensure there is always adequate space and green area for the horses year round. There is no other green area available for the horses in the Dublin 15 for the horses. Horses are very sensitive creatures and notice even the most minor change in their surroundings. Considering the horses would be surrounded by a construction site and will have their green space wiped out; Irish Rail will effectively close Ashtown Stables with the Dart West plan as it stands. It was highlighted to Irish Rail that the community do not want Ashtown Stables impacted by the Dart West project, whereby over 6,000 objections were submitted to Irish rail stating the stables must not be impacted by the Dart West project. In addition, a petition in support of Ashtown Stables has received over 4,000 signatories. You can view the petition at:  
<https://www.change.org/p/irish-rail-save-ashtown-stables>

I urge that An Bord Pleanála must not grant permission for Irish Rail to proceed with their proposals. Irish Rail should have sent a copy of Ashtown Stables' detailed objections to An Bord Pleanála as part of the Railway Order Application. I would urge An Board Pleanála to review these 6,000 submissions to truly understand the value of Ashtown Stables to the community and thus understand the impact that Dart West plan is having.

### **Community**

Ashtown Stables is a family run business providing a fantastic local facility to children and adults of all ages from Cabra, Finglas, Castleknock, Phibsborough, Drumcondra, Glasnevin, Blanchardstown and surrounding areas. Horse riding has many benefits to the community for mental health. The majority of riders are women and girls. Considering Ireland has a defined problem keeping women and girls in sport, it is disgraceful to see Irish Rail actively removing these girls from sport. The stables supports children and adults from all backgrounds. Many children with additional needs such as autism, dyspraxia and adhd benefit from horse riding at Ashtown Stables. There have been countless stories of people going through tough times that were supported by Ashtown Stables and the Reid family. It is not logical that Irish Rail would take this amenity from the community. It is very clear there are a lack of amenities in in Ashtown area, Irish Rail should have noted this in their plans and ensured that they were not removing one of the few amenities the area has.

### **Safety of children and others**

The construction activity planned by Irish Rail around the horses would endanger anyone interacting with the horses. Should An Bord Pleanála grant this permission, those making this decision must take responsibility for the closure of the Stables and the irreversible loss of a valued community amenity.

### **Dangerous Underpass at Ashtown**

Respondents have stated concerns regarding anti-social behaviour and the safety of the pedestrian under pass. Particular concern was related to safety of vulnerable users and women that would be unlikely to use the proposed underpass'. The addition of an underpass to the Ashtown area is not appropriate. Anti social behaviour is a daily occurrence in Ashtown- such as fires and drug dealings, putting an underpass will only encourage this anti social behaviour further. Anti social incidents are very evident on the local forums, there are incidents reported every night. These are also documented with Blanchardstown and Cabra Garda stations. I myself would not feel safe using this underpass. I urge An Bord Pleanála to investigate further the anti-social behaviour in Ashtown to truly understand the impact the addition this underpass would have.

### **Irish Rail's Conduct**

Irish Rail's Multi-Criteria Analysis was a work of fiction, deliberately skewed to return a pre-determined result. The option of dropping the railway was discarded at an early stage following clearly false conclusions. It was very concerning that the Irish Rail team provided conflicting information at the drop night held on 31 Mar 2022 at Plunketts GAA ground, this was observed by Minister Roderic O'Gorman. It was very evident that Irish Rail did not understand their own plans and thus made the open night pointless. This demonstrates lack of due process.

I am disappointed by the lack of communication from Irish Rail to the Ashtown Community on these major changes to the area. To date there is not a single sign from Irish Rail along the impacted pedestrian route. There is no signage to inform the community that the level crossings will be closing. This is lack of due process for our community.

Irish rail planned their webinars with very little notice, during August when the public representatives were on holidays along with most of the public, again this is lack of due process. From speaking to people in the Community it was very clear people were not aware and still are not aware of these significant changes. This would conclude that the communication strategy on these major changes was not sufficient. It is very clear from the process that Irish Rail already had their mind made up and were simply going through the motions with a box ticking exercise.

### **Environment**

Ashtown stables acts as an ecological corridor to the Phoenix park from the Tolka Valley. It has many habitants other than horses such as Brent geese, bats, otters, badgers, foxes, bees, Robins, swallows to name a few. It should be noted that Brent Geese (a species protected by EU law) on their annual migratory path via Dublin Bay regularly feed on the stables lands. In addition it should be noted that Daubenton Bats (*Myotis daubentonii*) have been found roosting on the stable lands. This is most likely due to the proximity to the canal water source without the disturbance of street lighting , the extant liner corridor of hedgerow and trees on the stable lands and roof undercroft space of the stables block. These animals thrive on the Ashtown Stables land. It is very concerning that Irish rail discarded other options in their Multi Criteria Analysis due to Brent Geese feeding sites, however they have chosen to take the land at Ashtown Stables that has been identified as a Brent Geese feeding site.

All bat species in Ireland are protected under both national legislation (Wildlife Act, 1976, as amended) and European legislation (Habitats Directive 92/43/EEC). The Habitats Directive is transposed into Irish law by the European Communities (Natural Habitats) Regulations (S.I. 94 of 1997). The Irish Government is also a signatory to the Bonn Convention (Convention on the Conservation of Migratory Species of Wild Animals (Bonn, 1979)) and the Bern Convention, 1982 (The Convention on the Conservation of European Wildlife and Natural Habitats) and has a commitment to the "Eurobats" Agreement (Agreement on the Conservation of Bats in Europe, 1991). The Habitats Directive provides protection for the habitats and roosts of all bat species as well as the bats themselves. Bat roosts are protected, irrespective of whether or not they fall within the boundaries of a Special Area of Conservation. For all bats, it is an offence to disturb, injure or kill bats or disturb or destroy their roosts.

Irish Rail plan a construction site that is approximately 400 metres away from the railway on two separate roads on the south side of the canal alone. This is simply overkill. Irish Rail have other options that would not have such a detrimental effect on the Environment. Government agencies need to lead by example when it comes to minimising the effect of construction on the Environment. Government agencies should be doing what they can to enhance the survival of protected species. An Bord Pleanála cannot grant permission for a project that leads to the deliberate and unnecessary mortality of rare, protected species in a city centre.

It must be remembered that Government agencies are bound by the Climate Action Plan, the National Biodiversity Action Plan and the Wildlife Amendment Bill (2016). Irish Rail's current plans contravene these conventions. Therefore, An Bord Pleanála cannot grant permission for this project.

### **Flooding**

Irish Rail's plans have not considered the flooding that is encountered on Mill lane, along with the whole south side of the Canal. The Dart West project is not compatible with the very evident flooding in the area. An Bord Pleanála cannot grant permission for a project that will cost a large sum of money to build a tunnel that will flood.

### **Solution**

Irish Rail's own documentation states that they will endeavour to stay within their own property wherever possible. This plan proposes forcibly taking land that is 300 metres from the railway. This is simply beyond their remit and cannot be construed as being for the common good. Using a Compulsory Purchase Order for a land grab of property that the Reid family refused to sell to countless developers over decades of property booms will not be tolerated.

Irish Rail has at least 14 other options. Other options available to Irish Rail do not involve the closure of the Stables, do not segregate our community, do not impact protected species and do not involve the construction of a dangerous, costly tunnel and an ugly bridge. I urge An Bord Pleanála to consider option 9 as the "preferred" option to the Ashtown community. Option 9 is commented as being the most favourable to the local and wider community as it would avoid demolition of the Ashtown Stables and would comprise lowering of the track.'

### **Oral Hearing**

I would like to request an oral hearing with An Bord Pleanála.

Regards,  
Sharon Weldon,  
22 High Park, Gracepark Road, Drumcondra, Dublin 09.