

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

Online submission
28.10.2022

Re: "DART+ West Electrified Railway Order 2022"

Please find attached my observation in respect of the above railway order pertaining the partial acquisition under CPO of Ashtown Stables for the purposes of a proposed access road at Ashtown due to the proposed level crossing closure at Ashtown.

Ashtown Stables, Ashtown, Dublin 15 is a stables which I attend riding lessons weekly. I have attended public meetings held by Irish Rail for the non-statutory phases two and three. It was clear that the majority of those participating in the public consultation phase myself included, are in favour of electrification of the Maynooth Railway line. Stage three or amended stage two preferred option by Irish Rail was presented on foot of 6,341 observations submitted pertaining to Ashtown stage 2 of the non-statutory phase. It was apparent from the non-statutory phase that there was substantial outcry at the forced removal of the last remaining Stables within the canals of Dublin. I welcome the fact that Irish Rail acknowledged the importance of the retention of Ashtown Stables following the public demand that the riding school remain in its current location. It was noted by Irish Rail in the 3rd consultation meeting that the majority of observations for the second phase pertaining to Ashtown related to the riding school, Ashtown Stables. Appendix A3.2; Consultation No. 2; Consultation Findings Report notes that this required a re-evaluation of the preferred option by Irish Rail. Other matters of concern were as follows noted in the consultation findings report:

4.1.1.2 Concerns About Safety of Underpass and Anti-social Behaviour where

'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'.

4.1.1.3 Concern Relating to Cultural Heritage Impacts where 'Concerns were raised relating to the archaeological and architectural heritage impacts on the stables. Respondents raised concerns that the archaeological potential of the stables site has not been tested and there is a potential for prehistoric and early medieval and archaeology remains'

4.1.1.5 Impacts on Rathbourne [community severance]

'Respondents expressed concern regarding impacts on the access to the shops and facilities in Rathbourne. Concerns were raised regarding the tunnel and pedestrian access to and from Rathbourne, specifying the need for well-lit and preserved pedestrian ways to ensure that residents feel safe.'

4.1.1.6 Request Review of MCA process and Further Consideration of Option 9 for Track Lowering at Ashtown

Respondents requested reconsideration of 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.’

4.1.1.7 Mobility and accessibility- the gradient of the tunnel and having to use lifts

‘Concern was raised regarding the provision of lifts at Ashtown Station. Respondents expressed concern over the potential attraction of anti-social behaviour in the lifts, as well as community severance. Concerns were also raised regarding the accessibility for vulnerable and disabled users, as well as overcrowding of lifts and potential lift breakdown.’

4.1.1.8 Concerns about impact on biodiversity

‘Concern was also raised over the demolition of the Ashtown Stables and the biodiversity of the land, underlining that the stables are home to a wide range of wildlife including bats, owls, birds and other species. ’

It should be noted that Brent Geese 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.

Irish Rail noted in their response that:

‘A detailed baseline survey of the project extents and the zone of impact has been undertaken on lands where access has been permitted. Biodiversity has been considered in the MCA process however, this will be reviewed as part of the re-analysis of the Ashtown level crossing replacement option selection process to take account of the submissions from the public.’

In respect of the above non -statutory observations and response by Irish Rail the following is observed:

I welcome that item 4.1.1.1 *Request for Avoidance of Relocation / Destruction of Ashtown Stables* has been substantively addressed in the retention of Ashtown Stables in the current Railway order. However item 4.1.1.8 is of note here due to the high value biodiversity value of the site. In the submitted railway order the proposed works at Ashtown require a new access road and underpass to the west of the stables. This requires a partial CPO and temporary works CPO along the boundary condition of Ashtown Stables. The proposed development requires substantive tree and hedgerow removal from the southern portion of the lands of Ashtown Stables. No reference in the EIAR could be found in respect of mitigation vis a vis protected species on the lands of Ashtown Stables. No arboricultural survey appears in the publicly available documents online pertaining to the vegetation cover at the lands at Ashtown Stables. No detailed proposed planting plan has been presented in the publicly accessible documentation for Ashtown Stables. Section B-B for Ashtown on drawing 0105 appears to indicate the existing boundary is retained to the north eastern part of the lands. Section C-C requires a new boundary condition.

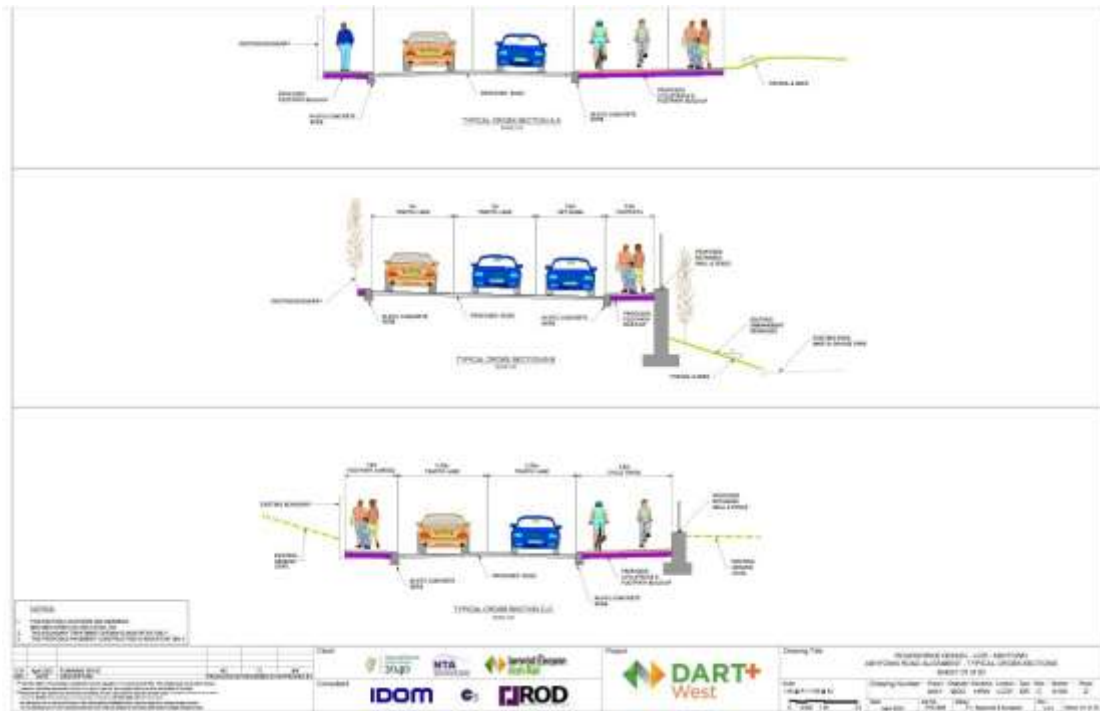
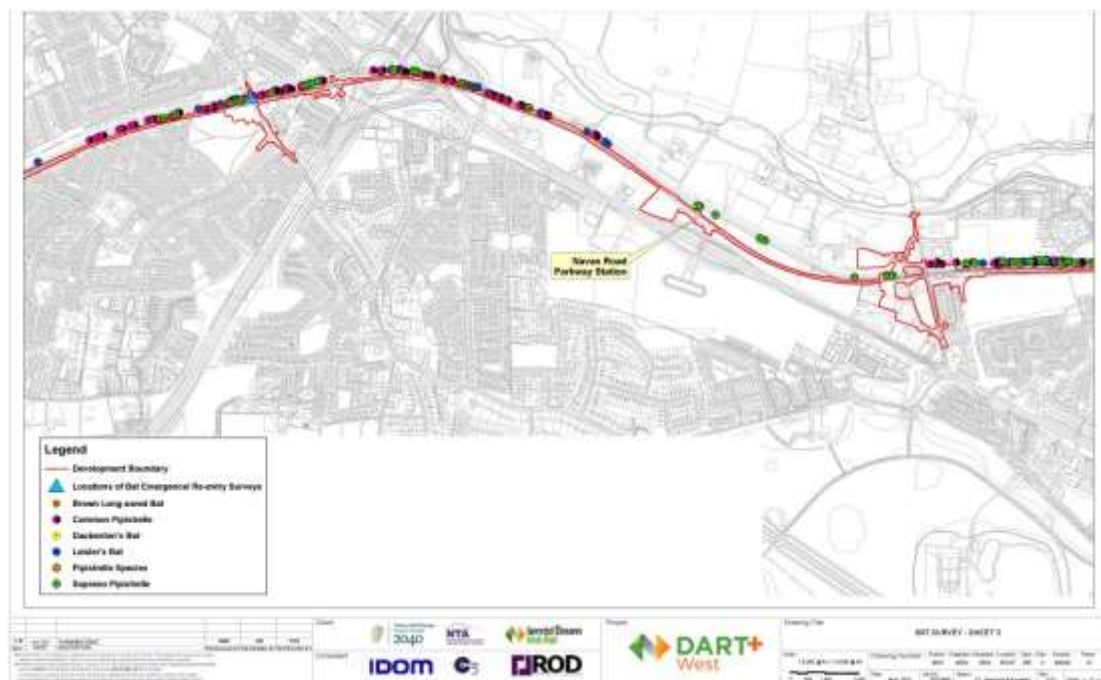


Figure 1 Section B-B stable lands on left, Section C-C stable lands on right.

These drawings are schematic and lack detail. As no detail planting plan is proposed it is of concern as to the type of proposed species and specification of any reinstatement planting. Some species such as oak for example are toxic to equines and are specified on the proposed planting schedules drawing, 15141. The extent of land under CPO of the stable lands is not dimensioned where heavy intervention is proposed along the boundary condition. There is a lack of clarity on mitigation *if any* on the biodiverse integrity and green infrastructure of Ashtown Stables in the proposed Railway order for Dart West.



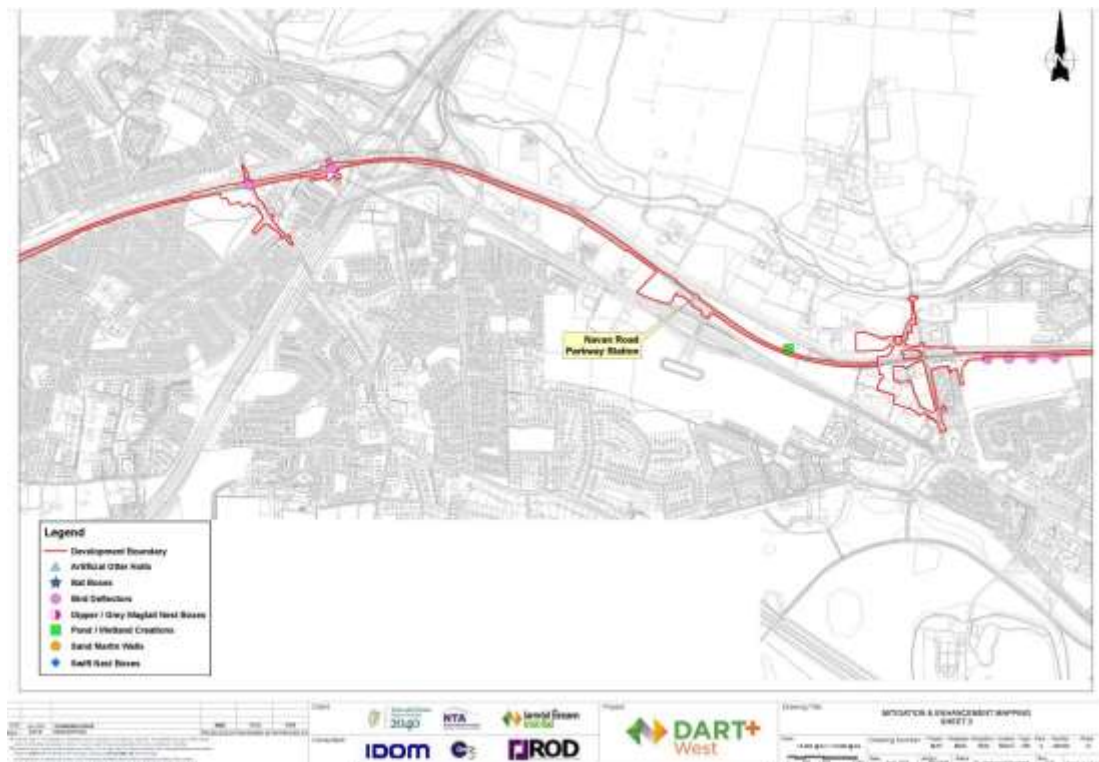


Figure 2 Extract of Bat Survey (Irish Railway order) and of mitigation. Note no survey taken for Ashtown Stables (top) and no mitigation on biodiverse grounds proposed (bottom).

Construction management, landscape impact and mitigation:

The programme of electrification of the Maynooth line is proposed to take 47 weeks. The methodology presented in the construction management plan is general and does not address specific properties directly impacted. It is unclear if Ashtown Stables will be able to remain operable during the construction works. No construction management plan has been presented for Ashtown Stables which directly bounds the proposed railway line lands and proposed access road.

The remaining items of concern in stage two of the consultation process remain only partially resolved. For example the underpass remains. Whilst a permanent accessible pedestrian walkway / ramp is proposed, lifts have been removed. Concerns were raised about the lift as the only mechanism for crossing the railway line other than an underpass not that it should be removed altogether. The risk of anti-social behaviour still remains with the re-aligned underpass. Community severance remains an issue as did the previous non -statutory proposal. The community preferred option of lowering the railway line to avoid this concern has been ignored. Concerns about cultural and natural heritage have not been adequately mitigated. The EIAR does not adequately address the landscape visual impact caused by the removal of trees on the Ashtown Stable lands, the adjoining lands to Ashtown Mill and Aston House. The permanent intervention of Irish Rail infrastructure into this receiving landscape is not adequately addressed. There are conflicts in the landscape impact assessment documentation.

Here trees and hedgerows for removal are not documented in the landscape impact drawing yet is on the proposed mitigation plan. A new boundary condition is required to the south and south west. Yet the specific trees and hedging are not specified. For

example *Quercus robur* (English Oak) and *Quercus palustris* (pin oak) are described as the type of trees that may be used as street trees on drawing 15108 . Both oaks are toxic to equines and demonstrates that no consideration was given to the planting scheme 15108 which pertains to Ashtown Stables. *Quercus palustris* is a non-native tree is inappropriate as a reinstatement of the native trees and hedgerow that are extant on the lands of Ashtown Stables. To the south west the existing vegetation, trees and hedgerow are noted as retained yet a new boundary condition is proposed on section C-C aforementioned. Any trees specified are at a maximum girth size of 10-12cm girth or maximum height of 2.5m tall or as whips at 900mm tall. 'Street' trees are a maximum size of 16/20cm girth (no height specified). 10-12cm girth is not a 'semi-mature' tree and whips at 900mm tall will be significantly poorer in visual amenity for the foreseeable future to that which the public currently enjoy. The meagre planting schedule presented cannot replace the current setting in any meaningful way.

Landscape Mitigation - Planting Schedule

Species	Quantity	Height (m)	Notes
Quercus robur	10	2.5	
Quercus palustris	10	2.5	
...

Planting Schedule

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Quercus robur	10	2.5	
Quercus palustris	10	2.5	
...

Figure 3 Railway order proposed planting schedule.

There does not appear to be a consultant arborist involved in the production of information where no mitigation is proposed for tree or hedgerow retention. There are proposed changes in levels and excavation works proposed for road resurfacing along Ashtown Road and the proposed road. Therefore it would appear that it is likely that much of the existing bounded condition to Ashtown Stables will fail with the invasive nature of the works proposed.

Together with the lack of clarity on the construction management it would appear that Ashtown Stables will not be able to manage their equine stock safely as the planting and boundary detail is outside of their control and to be managed by Irish Rail. Nor is it tenable to understand how the construction works will permit the land use as a riding school to operate during the 47 week construction phase anticipated to commence in early 2023. That is without any delays that may occur over the course of the works.

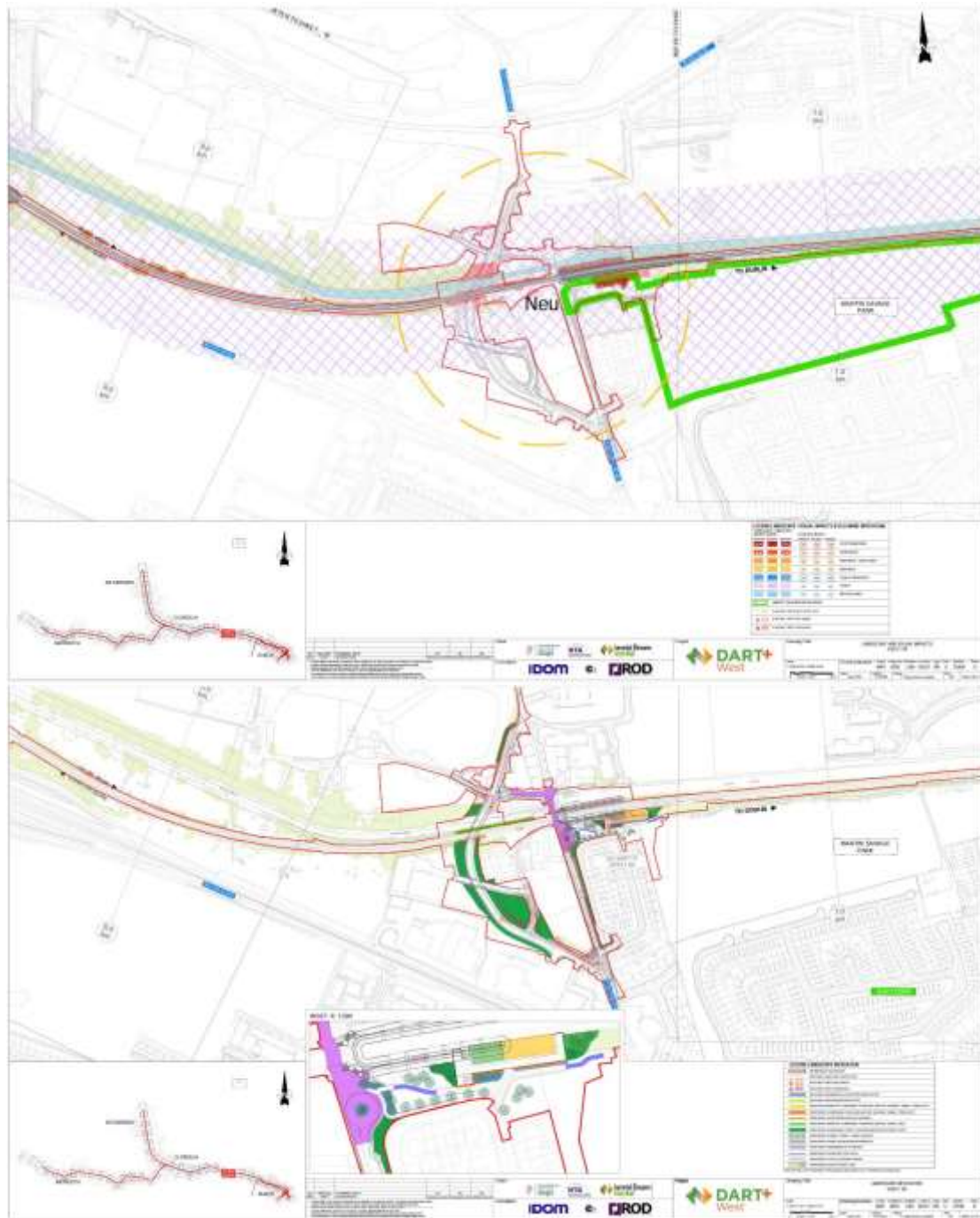


Figure 4 Top : Railway order Landscape impact drawing, Below: Railway order proposed mitigation . Note no trees noted for removal on southern part of Ashtown Stable lands under CPO in landscape impact drawing. These are noted for removal on the landscape mitigation drawing.

Conclusion:

In reviewing this SID the Dart West Railway order , I ask Board take full consideration of the above concerns and that any permitted works pertaining to this railway order be conditioned to involve the owners of Ashtown Stables in the detail and management of their lands given the inadequacy of mitigation presented. The loss of green and cultural infrastructure is irreparable but could be mitigated with the correct intervention. It is my opinion that impacts and mitigation are not adequately

presented in this railway order submission in respect of Ashtown Stables. It is clear from the public consultation phase that that Ashtown Stables is integral to the setting of Ashtown and therefore the protection, retention of the integrity of the riding school is imperative in any future infrastructure works.

I request that should an oral hearing be convened that I would like to be informed and to be in attendance.

Yours sincerely ,
Siocha Costello

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