

**Anna Lalor**  
**13 The Waxworks**  
**Rathborne Village**  
**Ashtown**  
**Dublin 15**  
**D15 YX92**

Garry Keegan  
Community Liasion Officer <sup>1</sup>  
DART+ West  
Iarnród Éireann  
Inchicore Works  
Inchicore Parade  
Dublin 8  
D08K6Y3

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**Submission to DART+ West Consultation No. 2, with a focus on Ashtown**

Dear Garry

I have not completed the online questionnaire as part of my consultation response but believe I have addressed all of the questions within this submission.

I am very supportive of enhancements to the Connolly/Dockland-Maynooth railway line and service level improvements, both as a commuter pre-pandemic and as a means of increasing the sustainability of transport in Ireland. As a resident of Rathborne Village, overlooking the railway and level crossing, I also welcome the prospect of reduced air pollution and congestion from queuing vehicles and reduced noise and air pollution from trains.

However, I have significant concerns regarding form and design of DART+ at Ashtown, in particular:

- the safety of an isolated underbridge within the current preferred option upon which pedestrian and cyclists would rely for access across the railway;
- the lack of balance between achieving railway upgrade functionality and the longer term implications for communities in terms of connectivity, permeability, liveability and coherence with the local character, design and heritage.

Both appear to be significantly mis-aligned with local and national planning strategy and policies.

I request that Irish rail review the plans for Ashtown to tackle these deficiencies, potentially with the inclusion of more expertise on urban design and architecture to the project team if necessary. In addition, I suggest that these can most effectively be addressed through engagement with Dublin City and Fingal County Councils, representatives of local communities and those most affected and by the level crossing closures.

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<sup>1</sup> Sent by email on 6 October 2021 to DARTWest@irishrail.ie.

To proceed without substantial changes directly to railway order would undermine the credibility of future consultations offered by Irish Rail and would ignore local, regional and national planning policy. Where changes are made, I ask that further consultation, be it targeted to specific aspects of DART+ West or broader, is be offered ahead of any railway order to enable community engagement and input, in particular given the €50 cost of submitting a response to the railway order application.

I aim in this submission to outline my concerns, but also to offer potential solutions. I am not an engineer or architect, but believe that with some creativity and some adaptation of the current preferred option, a more satisfactory and safer solution can be reached. Therefore, I provide some examples of alternatives that could be explored.

For instance, the provision of a well designed pedestrian and cycle access over the railway at Ashtown would mitigate many of the concerns about option 2 in terms of safety, connectivity and permeability, while potentially reducing the impact on Ashtown stables. However, I also believe that further assessment of option 9 (lowering of the railway below Ashtown road) from the initial consultation is warranted given it has the least long-term impact on connectivity within the community and does not appear to have been explored in sufficient depth.

Below I start with some contextual information in terms of the local community and why safe connectivity across the railway is important, as well as planning strategy and policy of relevance to the area and the DART+ project.

Next I address my concerns regarding the current preferred option in terms of safety and its integration into the area, and provide some suggestions and examples for how to mitigate some of these concerns.

Finally I outline some additional considerations and suggestions, including on engagement with local communities.

## **1. Overview of Ashtown-Pelletstown and local and national policy of relevance**

The map over the page outlines areas of Ashtown-Navan Road south of the railway and Pelletstown/Rathborne north of the railway. The map excludes areas to the east that are now more accessible due to the recently opened pedestrian and cycle bridge at Pelletstown station. Despite the area to the south of the railway being a more established community, with Pelletstown/Rathborne being just under 20 years old, linkages have been developed over the years with both communities sharing the Navan Road-Pelletstown policing forum held with Cabra Gardaí and local councillors.

Based on the 2016 census and development since I estimate that there are about 3,200 people currently living in Rathborne. With recent and planned new housing units this could rise to closer to 5,500. Most homes are apartments, which means access to amenities such as the Phoenix park are very important, in particular for families and those without motorized transport. There is significant use of public transport, both rail, and bus routes on the Navan Road, while many cross the railway to access schools, childcare and work either side of the railway. In the 2016 census over 20% of commuters/school-goers travelled by foot or bike.

### Local amenities north and south side of the railway



Red oval – site of level crossing. Blue boxes – businesses, amenities. Yellow CC – childcare/ECCE. Green – Greenway/GDA Cycle Network routes, Orange – Public transport.

There has been significant infrastructure investment on Dunsinea Lane over the past two years, including new segregated footpaths, some of which is to improve access to Rathborne Village and beyond from the new Rathborne nursing home as well as Teagasc and other homes, businesses and Phoenix football club. It is also hoped that a cycle route from Dunsink Observatory will be provided along this route.

As can be seen from the table below provided by Irish Rail as part of the consultation, significant pedestrian and cycle traffic (as a percentage of the local population) is primarily southbound in the morning – so from Rathborne towards the Navan Road, which indicates most is not related to rail travel given that Dublin-bound rail services depart from the northern platform. Traffic reverses during the evening peak. It is not clear whether the statistics below capture those using the pedestrian bridge to traverse the railway line when the level crossing is closed. Northbound travel could relate to rail

passengers (not using the pedestrian bridge) and those accessing childcare and work in Rathborne and Dunsinea Lane.

<b>Pedestrians and cyclists crossing the railway at Ashtown at peak times<sup>2</sup></b>					
Crossing	Time Period	Pedestrians		Cyclists	
		N/B	S/B	N/B	S/B
Ashtown	AM	150	672	65	44
	PM	574	217	53	56

*Peak is between 07:00 to 10:00 in the AM, and 16:00 to 19:00 in the PM.*

Turning to **strategy and policy**, I have provided excerpts from local, Dublin City and national strategy and policy documents of relevance to the area and the DART+ project. They also support concerns I have regarding preferred option and the importance of identifying a suitable replacement for the level crossing and appropriate integration of relevant infrastructure into the local area. DART+ is obviously part of these policies in terms of provision of good quality public transport, however, it is clear that this cannot be examined in isolation of policy applicable to the communities it traverses and serves.

I considered simply referring to the relevant documents or including them in the annex, but given their relevance to the selection of options to replace the level crossing at Ashtown providing them below seems appropriate.

Firstly, the box below outlines **local planning policy statements for the area** that are of relevance for the option selection and how it is integrated into the local environs. It is clear that safety, accessibility and permeability are important aspects, including in the context of access to public transport and connecting cycle routes.

**Dublin City Development plan 2018 to 2022<sup>3</sup>**

**Movement and transport policies:**

**MT7:** To improve the city’s environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with green infrastructure objectives and on foot of (inter alia) the NTA’s Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.

**MT11:** *To continue to promote improved permeability for both cyclists and pedestrians in existing urban areas in line with the National Transport Authority’s document ‘Permeability – a best practice guide’. Also, to carry out a permeability and accessibility study of appropriate areas in the vicinity of all Luas, rail and BRT routes and stations, in co-operation with Transport Infrastructure Ireland and the National Transport Authority.*

**MT12:** To improve the pedestrian environment and *promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all.*

<sup>2</sup> Annex 8.1 Technical note on level crossings to support PC – table 2.6

<sup>3</sup> <https://www.dublincity.ie/dublin-city-development-plan-2016-2022>

**MT23: To improve facilities and encourage relevant transport agencies/transport providers to provide for the needs of people with mobility impairment and/or disabilities including the elderly and parents with children.**

**Movement and transport objectives:**

**MT09: To develop, within the lifetime of this plan, the Strategic Cycle Network for Dublin city - connecting key city centre destinations to the wider city and the national cycle network, and to *implement the NTA's Greater Dublin Area Cycle Network Plan* to bring forward planning and design of the Santry River Greenway, *incorporating strongly integrative social and community development initiatives.***

**MT018: To develop a high-quality pedestrian environment at new public transport interchanges and to consider the needs of pedestrians in the design of all infrastructure projects**

**Pelletstown-Ashtown Local Area Plan (LAP), January 2014<sup>4 5</sup>**

**Movement and transport strategy:**

***To seek the interconnection of walking and cycling routes with key public transport and amenity destinations (both existing and planned).***<sup>6</sup>

Regarding the replacement of the manned level crossing at Ashtown the LAP notes that ***"In any solution proposed, Dublin City Council will seek to ensure that strong connectivity, particularly for pedestrians and cyclists, is maintained at the junction."***

**Movement and access Policies:**

**MA1: To improve accessibility throughout the plan area, facilitate the completion of a hierarchical road infrastructure network, and **encourage links to existing and proposed public transport nodes both within and beyond the LAP boundary.****

**MA3: To promote increased cycling and pedestrian activity through the development of a network of routes that connect to public transport routes, centres of employment, amenities, and community and retail destinations.**

**Movement and access objectives:**

***MA07: To encourage and facilitate, in cooperation with Fingal County Council and Iarnrod Eireann, 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.***

**Cultural Heritage Policies**

<sup>4</sup> [https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/Pellestown\\_Full\\_Doc\\_January\\_2013\\_Part2.pdf](https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/Pellestown_Full_Doc_January_2013_Part2.pdf)

<sup>5</sup> 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.

<sup>6</sup> These would include the Navan Road bus service and the Phoenix Park.

**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

#### **Cultural Heritage Objectives**

**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

#### **NTA – Greater Dublin Area Cycle Network Plan (2013)<sup>7</sup>**

The NTAs GDA cycle network plan includes the Royal Canal Greenway and the Tolka Valley Greenway which are linked to the Phoenix Greenway and beyond by Ashtown Road.

#### **Pelletstown Action Area Plan (2000)**

- To encourage the creation of a sustainable living environment.
- To optimise the use of public transport
- To provide an urban design framework to generate imaginative responses in the development of a viable and vibrant living environment.
- To promote the creation of high quality urban spaces where art, architecture and landscape architecture are dynamic components.

The National Planning Framework<sup>8</sup>, which was published alongside the National Development Plan 2018-2027, sets out a number of concepts, enablers and policy objectives which again are of relevance in relation to concerns regarding the current option.

#### **National Planning Framework (NPF):**

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:

- 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,**

<sup>7</sup> <https://www.nationaltransport.ie/planning-and-investment/transport-investment/greater-dublin-area-cycle-network-plan/>

<sup>8</sup> <https://www.gov.ie/pdf/?file=https://assets.gov.ie/166/310818095340-Project-Ireland-2040-NPF.pdf#page=1>

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.

The recently released National Development Plan 2021-2030<sup>9</sup> shows how infrastructure is an **enabler** for achieving critical mass in urban areas with a view to creating more attractive places to live and work, which highlights the relative importance place, which is not reflected within the current DART+ West proposals. Likewise, the importance of **both** active travel in well-connected local communities and good quality public transport is clear.

**National Development Plan 2021-2030**

*Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating*

<sup>9</sup> <https://www.gov.ie/en/publication/774e2-national-development-plan-2021-2030/>

*more attractive places for people to live and work in*, facilitating economic growth and employment creation by increasing Ireland's attractiveness to foreign investment and strengthening opportunities for indigenous enterprise.

A transport-led housing development approach will allow for the emergence of sustainable and **well-connected communities where active travel is feasible and attractive for many localised journeys and good quality public transport is available to facilitate longer journeys** into the major urban centres. **Urban, compact growth will be supported under this NDP through investment in high quality integrated active travel and public transport systems and supporting amenities.**

The NTAs Greater Dublin Area Transport Strategy 2016-2035<sup>10</sup> also provides some relevant considerations.

#### **NTA Greater Dublin Area Transport Strategy 2016-2035**

On review of existing policies of relevance in setting its strategy the key messages that emerged included:

- A safe cycling network, with extensive coverage in metropolitan Dublin and in other towns, is needed to cater for the increased use of cycling that is already occurring and to reduce the dominance of the private car in meeting travel needs;
- **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

#### **Walking**

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.**

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<sup>10</sup> [https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport\\_Strategy\\_for\\_the\\_Greater\\_Dublin\\_Area\\_2016-2035.pdf](https://www.nationaltransport.ie/wp-content/uploads/2016/08/Transport_Strategy_for_the_Greater_Dublin_Area_2016-2035.pdf)



Chapter 16 of Dublin City Council's 2016-2022 development plan<sup>11</sup> sets out design principals which are an important reference in terms of integrating the project with the existing residential and public setting, as set out in MA07 of the Pelletstown-Ashtown LAP. While perhaps not directly applicable to infrastructure projects, this highlights the standards that Dublin City Council believes are appropriate for communities and, therefore, should also underpin any other major development that significantly impacts the places where people live and work.

**Excerpts from Chapter 16 of Dublin City Council's 2016-2022 development plan – Development standards**

In the appropriate context, imaginative contemporary architecture is encouraged, provided that it respects Dublin's heritage and local distinctiveness and enriches its city environment. **Through its design, use of materials and finishes, development will make a positive contribution to the townscape and urban realm, and to its environmental performance.** In particular, **development will respond creatively to and respect and enhance its context, and have regard to:**

1. The **character of adjacent buildings, the spaces around and between** them and the character and appearance of the local area and the need to provide appropriate enclosure to streets;
2. The character, scale and pattern of historic streets, squares, lanes, mewses and passageways;
3. **Existing materials, detailing**, building lines, scale, orientation, height and massing, and plot width. **The form, character and ecological value of parks, gardens and open spaces**, and
4. **Dublin's riverside and canal-side settings.**

**All development proposals should contribute to the creation of attractive, active, functional and publicly accessible streets and spaces (between buildings), promoting connectivity, walking** and resisting the gating of streets. Gated developments will be discouraged as they prevent permeability.

Development must incorporate design measures for:

1. Maintaining a clear distinction between public and private spaces
2. **Promoting safety, visibility and facilitating the natural surveillance of adjoining routes and spaces.**

**Development must be designed to meet the needs and convenience of all**, in particular:

1. Incorporating inclusive design principles in new places and spaces and not introducing barriers to access, and
2. Wherever practicable, removing barriers to access and use of existing buildings and spaces by all users.

**Inclusive design**, therefore, **requires** all proposals, whether they relate to new buildings, **public realm works**, changes of use or alterations to existing buildings, to **consider the needs of the widest possible range of different user groups from project outset and in particular to consider the needs of vulnerable groups such as**

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<sup>11</sup> <https://www.dublincity.ie/sites/default/files/2020-08/written-statement-volume-1.pdf>

**the elderly and disabled.**

**Boundaries and street furniture:** Walls, fences, metal railings and gates used to define spaces and their usage all impact on the visual character of the development. **These should be selected so as to be an integrated part of overall design.**

### **Soft Landscaping Including Trees**

Key requirements in relation to site development and landscaping works include the following:

- a) Existing trees and vegetation should be retained where possible.
- b) For larger sites, including institutional lands, development proposals must take cognisance of the existing landscape character and quality
- c) Where a large site adjoins a green corridor, public open space or area of high ecological value, any new public open space on the site should be contiguous to same to encourage visual continuity and expansion of biodiversity; this can assist in expanding the green infrastructure network
- d) Landscaping works should be integrated with sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off
- e) Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety.

### **Existing trees and their protection**

The successful retention of suitable trees is a benchmark of sustainable development. Trees of good quality and condition are an asset to a site and significantly increase its attractiveness and value.

## **2. Current preferred option for Ashtown**

As noted above I am very supportive of the upgrade to the railway line and recognize that with increased frequency maintaining the level crossing would be unworkable.

While option 2 acknowledges the need for continued pedestrian, cycle and vehicular crossing of the railway at Ashtown, I am very concerned about the safety of the underbridge for pedestrians and cyclists. The proposed new road and underbridge would be very secluded and are not overlooked, which increases the likelihood of anti-social behaviour and crime. Already there is an element of anti-social behaviour in the area and a location such as a secluded underbridge would most likely attract problems.

I am somewhat surprised, that given the views expressed at the first consultation regarding safety of the underbridge that the stage 2 Multi-criteria analysis (MCA) for the criteria 'pedestrian, cyclist and vulnerable road user safety', 'impact on vulnerable groups and social inclusion' are rated 'some comparative advantage' while 'station accessibility for vulnerable groups' is rated comparable to other stage 2 options.

I recognize that Irish Rail has said that the pedestrian bridge over the railway and lift will be available to rail and non-rail users, while it has been indicated that CCTV would be installed around the underbridge.

In relation to access to the bridge and lift, I note that the DART+ West Brochure on page 33 states that **"This bridge will be available to passengers and the public during**

**station operational hours”** which would mean people using the underbridge at the least safe time. However, Irish Rail have given assurances on calls during the consultation that lifts would be available to non-rail users 24-7. Regardless, it is to be expected that lifts will be down at times<sup>12</sup> which would see Irish Rail customers with mobility challenges, with buggies or otherwise unable to use the stairs, making a 320 metre trip with an 8 meter accent to access the opposite platform, with the requirement to use the underbridge. The same would apply to non-rail users in a similar situation needing to cross the railway.

Regarding CCTV I am not confident that it a sufficient deterrent. There is CCTV throughout Rathborne and Royal Canal Park, but it has not prevented an increase in anti-social behaviour. Only recently significant damage was done to one of the lobby's in a local apartment block, off a busy street and in full view of CCTV. Those involved are generally good at hiding their identities or are not fearful of repercussions if caught.

The reliance on a secluded underbridge for access to the opposite side of the railway for people with mobility impairment and/or disabilities including the elderly and parents with children would affect the livability of the area through reduced safety in accessing local amenities and potentially restricting access where fear over personal safety outweighs the need to access such amenities.

In terms of pedestrian and cycle access, it appears that option 2 is not aligned to the strategies and policies set out in National Planning Framework, the recent National Development Plan, the NTA's recommendations on permeability (below), the NTA's Greater Dublin Area Transport Strategy, the Dublin City Council Development plan and the Pelletstown-Ashtown Local Area Plan (LAP) as set out above. The Dublin City Council development plan and LAP listed also include commitments to work with Irish Rail, the NTA and NTI to achieve permeability and connectivity and integration of public transport, which in the case of Rathborne would include access to the bus network on the Navan Road (and vice versa for those living south of the railway to access the railway citybound).

As noted earlier, access over the canal and railway from north to south is very important for transport links on the Navan Road and to local amenities such as schools and child care, the Phoenix Park and Plunketts GAA playing pitches. The latter two are of particular importance to individuals and families living in apartments. There is also community movement in the opposite direction to access Tolka Valley Park, supermarkets, restaurants, Phoenix football club and other local businesses. In addition, an unsafe tunnel could affect the success of integrating the Royal Canal and Tolka Valley greenways with the Phoenix Park as planned as part of the Greater Dublin Area Cycle Network.

In 2015 the NTA published *Permeability – A best practice guide*<sup>13</sup>, excerpts from which are provided in the box below. I believe the issues mentioned are extremely relevant to the decisions around the design of access between north and south of the railway where the level crossing at Ashtown is closed.

The preferred option, with the seclusion of the underpass and the road leading to it from the south (neither of which are overlooked) is at odds with the NTAs proposals on maintaining permeability in the community. I note in particular the benefits to the community and social cohesion that permeability provides and that “the design and

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<sup>12</sup> For instance 7 stations had lifts out of order for more than 20 days each in 2019 - <https://www.thejournal.ie/lifts-out-of-order-4900866-Nov2019/>

<sup>13</sup> [https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability\\_Best\\_Practice\\_Guide\\_NTA\\_20151.pdf](https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability_Best_Practice_Guide_NTA_20151.pdf)

environment associated with impermeable neighbourhoods can affect pedestrian and cyclist safety” and good design can reduce anti-social behaviour. In essence poor design is inferred to increase anti-social behaviour and reduce pedestrian and cyclist safety.

### **Permeability –A best practice guide - NTA**

The features of a permeable neighbourhood as follows:

- Interconnected pedestrian and cycle street network;
- Absence of high walls and fences segregating housing areas and local/district centres;
- Absence of cul-de-sacs for pedestrians and cyclists; and
- **Secure, well-lit, overlooked pedestrian and cycle links between housing areas and between housing and local/district centres.**

There are tangible local economic benefits to be gained from maintaining and creating pedestrian and cycle links in urban and suburban areas.

Good neighbourhood planning seeks to provide connected neighbourhoods and to create lively and useable spaces in the urban environment. Such an approach, it is believed, helps to increase the social capital of a neighbourhood. This relates to the intangible benefits of day-to-day social interactions, shared norms and values such as cultural interests and community-based activities, as well as residents acting collectively for a common purpose. At its most basic level, this can foster social cohesion and help to prevent the growth of crime, particularly those offences often associated with urban and suburban areas such as vandalism.

By increasing the levels of permeability, the opportunities for social interaction increase, and with it, the social capital necessary for successful neighbourhoods is also increased. If people have a higher tendency to walk and cycle around their neighbourhood, they are more likely to meet each other. Often it is these meetings which give a sense of community more than formal arrangements and a greater sense of community is often cited as a key requirement in addressing many anti-social behaviour problems in Irish urban areas.

A higher number of pedestrians and cyclists in housing estates and neighbourhood centres also changes the perception of a place in terms of safety. Passive supervision, the mere presence of more people, makes the place safer. By maintaining or creating links for pedestrians and cyclists, this enhanced safety can be provided

The **needs of pedestrians and cyclists can be categorised under five headings**, as follows:

1. **Safety – is it safe to walk or cycle from someone’s house to their destination?**
2. Coherence – is it obvious to the cyclist or pedestrian where to go? Is the route legible?
3. Directness – is the route direct?
4. **Attractiveness – does the cycle or walking route attract or deter users by virtue of the impression it gives to passers-by** and is it well-maintained?
5. Comfort – is the route comfortable to walk and cycle on? Is the surface even and consistent?

The design and environment associated with impermeable neighbourhoods can affect pedestrian and cyclist safety.

The fundamental consideration for enhancing permeability is to set out the rationale for maintaining or providing a link – who are we serving and for what reason. In this

regard, the main origins and destinations in an urban area or district should be identified and links maintained or provided between them.

The following should be considered when examining permeability in urban areas:

- **People should be able to walk and cycle directly and safely to their local neighbourhood centre and district centre from their houses;**
- **Children should be able to walk and cycle safely from their homes to school;**
- **Public transport stops and stations should be safely and directly accessible from residential areas.**

A link needs to be designed in a manner that is fit for purpose and as such will be well used. At the outset it is therefore vital that the precise function of a link is defined based on the anticipated levels of usage and the types of users ...

The following elements, which are elaborated on below, will determine how fit for purpose a link is:

- Width and Clear Passage
- Surface Quality
- Lighting
- **Overlooking or Passive Supervision - Ideally all links would be overlooked somewhat by housing to allow passive supervision. Anti-social behaviour and crime are less likely in such an area.**

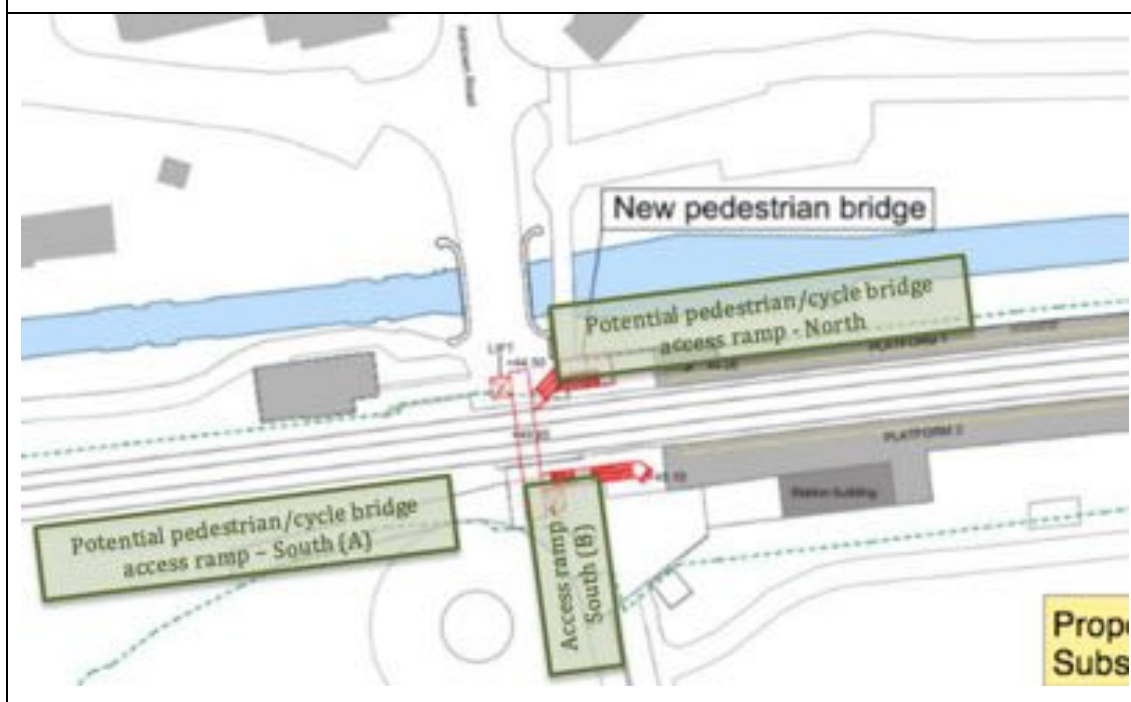
### **3. Suggestions to address concerns over pedestrian and cycle access across the railway**

A variation on option 2 could mitigate some of the issues with the preferred option as currently set out. This would primarily involve the underbridge being solely for vehicular traffic plus the provision of a pedestrian and cycle bridge over the railway. I believe an overbridge as outlined in option 3 would encounter similar safety and permeability issues as the underbridge in terms of isolation. However, options 4b and 8 include a pedestrian and cycle bridge over the railway. In effect this would be an option 2+8. I am a little surprised that this was not examined as part of the stage 1 or stage 2 options.

Incorporation of a bridge providing pedestrian and cycle access would allow for narrowing of the proposed road down Mill Lane and remove the need for an embankment and pedestrian linkage from Ashtown Road to the new Mill Lane (the purpose of which I understand to be to open up the space to try and increase safety for pedestrians as well as providing for separate pedestrian access to the underbridge closer to the station). I believe this would significantly reduce the impact on the stables, addressing some of the concerns raised about its being subject to CPO.

In addition, it may be possible to construct the bridge so that it is on relatively the same level on both sides of the railway, with the difference in height between the north and south to the east identified on a call by Irish Rail as being one of the reasons this option was not progressed. This could be achieved by using the land owned by Irish Rail to the south of the railway or by using the existing Ashtown Road on the south and moving the set-down area to the area at the entrance to Ashtown Stables. See below for example. Alternatively a bridge could be moved further east, but this may reduce the degree to which the bridge would be overlooked, particularly from the south.

### Alternative pedestrian cycle bridge access routes



In addition, given it has the least impact in terms of connectivity and permeability in the community I believe that further exploration of option 9, where the railway is lowered under Ashtown road, is merited to examine its feasibility, environmental and heritage impacts and better understand the relative cost. While I have some reservations about its environmental impact I do believe it deserves further assessment.

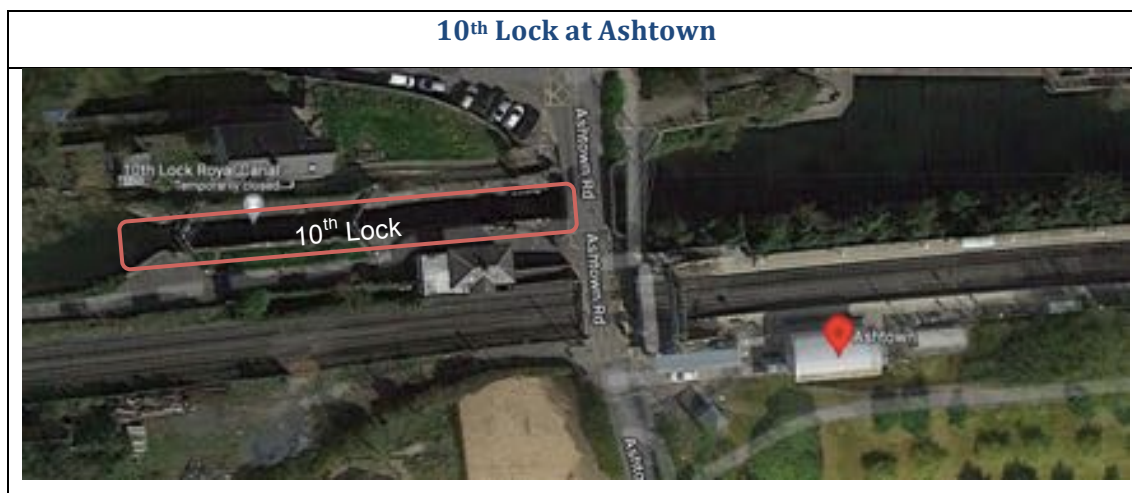
The MCA which compared stage 1 options comments in relation to the construction costs for option 9 that “the cost and disruption of a scheme of this nature would be unsustainable and unjustifiable in comparison to other options available. It is proposed to discard this option without further consideration.” It could be interpreted, examining the commentary and ratings<sup>14</sup> given to other criteria for option 9, that much of the rest of the assessment was geared to reinforcing the rejection of option 9.

In particular, under biodiversity, it is stated that “During the construction stages water quality in the canal could be significantly impacted during the [d]ewatering required for the channelisation and realignment and lowering of the canal **in addition to the demolition of the canal bridge and locks**”. These impacts, in particular the demolition of the canal bridge and locks (it appears the 10<sup>th</sup> lock) seem very severe and it is difficult to understand why aspects such as this would be necessary (see picture below). While not ideal to disturb the canal, it would be good to have some evidence from previous construction projects where canal has been affected to understand the impact in more detail.

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<sup>14</sup> For instance, for safety for rail users, option 2 is rated ‘Significant comparative advantage’ due to the removal of the level crossing, but option 9 was rated ‘Significant comparative disadvantage’. In terms of Traffic Functionality/economic benefit - Benefits to vehicular traffic through reduction in journey time lengths and delays through removal of level crossings. Consideration of potentially longer routes for traffic. – option 2 was rated ‘Significant comparative advantage’, but option 9 was rated ‘Some comparative advantage’. Similar again for transport integration.

In particular, I note that Dublin City Council, as part of Phase 4 of the Royal Canal Greenway from Cross Guns Bridge to Rathborne Village (planning application reference 3513/21) plans to dewater part of the canal in order to facilitate widening of the towpath for an aggregate area of 1km to the east of Pelletstown station. Waterways Ireland has submitted that it does not object to these works, while it has been determined that the works do not require an environmental impact assessment.



I also recognize the inconvenience both to Irish Rail and rail users (of which I am one) that would occur over the period of construction if the railway was lowered, which would require either alternative transport modes or else buses between the Navan Road Parkway/Castleknock stations and Pelletstown station. However, I think this needs to be balanced against the longer-term outcomes and impacts of the project on both the railway and the local community.

#### **4. Balance between functionality and long term community impacts**

I am concerned that the primary focus of the DART+ West project and consultation is on achieving the functionality of the railway upgrade and maintaining some route across the railway line where level crossings are closed. However, limited consideration appears to be given to how to best manage the longer-term impact of level crossing closures on communities and local environs (which are interlinked), other than the benefit that locals will have of an improved railway service. This issue is of relevance in the context of some of the policy considerations set out in point 1 above. While the most significant impact relates to the current underbridge proposed in option 2, there are wider considerations in relation to the DART+ project more generally and it's integration into the local area.

As a taxpayer, I recognize the need to manage costs. However, as is becoming increasingly recognized nationally and internationally through the focus on Environmental, Social and Governance (ESG), we also need to consider the intangible costs and benefits of investments. This equally applies to government investment as much as private investment. While the DART+ project ticks the Environmental box, it also needs to do more to meet Social objectives, in this case it's impact on the safety and cohesion of the community.

Rathborne Village is one of the two village centres envisaged for Rathborne (to the west) and Royal Canal Park (to the east). It comprises a market square and along the canal tow path, a linear public open space or 'canal boulevard' and includes art work (lock-keeper) and an attractive cable-stay pedestrian bridge over the canal. The area also encompasses the 10<sup>th</sup> lock, Ashton house and views over the stables and mill on Mill

Lane. Along the canal, Ashtown road and Plunketts GAA grounds (along the railway line) there is an abundance of hedgerows and associated wildlife.

The proposed overground structures and finishings proposed in the consultation are not in keeping with the existing surroundings. Chapter 16 of Dublin City Council's 2016-2022 development plan<sup>15</sup>, referred to earlier, sets out design principals are an important reference in this regard. 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 MA07 of the Pelletstown-Ashtown LAP:

*To encourage and facilitate, in cooperation with Fingal County Council and Iarnrod Eireann, 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.*

For instance, the proposed design of the pedestrian bridge and lift over the over the railway line (see over the page) is completely out of keeping with the local area, while it is proposed to put palisade fencing where the existing level cross gates are currently.

While Irish Rail representatives have noted on a call that finishing would be agreed with residents, I am concerned this related largely to changes directly affecting the buildings in Rathborne Village from construction.

Developing my suggestion regarding a pedestrian/cycle bridge in the first point, I believe that it is possible to construct a pedestrian and cycle bridge that is sympathetic to the existing surroundings, while also addressing some of the constraints arising from limited space at Ashtown. I am not an architect or engineer, but having researched the topic, it appears that while these may potentially cost more in terms of initial design, some of that cost may be recouped by reduced material, less construction work and lower building costs.

One option is to use of cable stayed bridge and/or spiral/curved deck access. I understand that a cable-stayed bridge would allow for more of the load-bearing infrastructure to be located in the most appropriate place (perhaps south of the railway), while also being more in keeping with existing infrastructure. In addition, spiral/curved access would allow for better use to be made of space where it is constrained, at least on the north of the railway. As proposed in option 8 as outlined by Irish Rail, this could incorporate or replace the exiting cable-stay bridge over the canal or at least incorporate some of its infrastructure.

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<sup>15</sup> <https://www.dublincity.ie/sites/default/files/2020-08/written-statement-volume-1.pdf>



**Proposed pedestrian bridge at Ashtown**



I have provided over the page some examples of cable stayed and/or spiral/curved access pedestrian and cycle bridges. While none of these would fit the situation at Ashtown specifically they highlight the flexibility of this type of bridge design and it's less industrial appearance.

**Cable stayed bridge with weight supported in optimal area - Newton Abbot**



**Cable stayed bridge with weight supported in optimal area - Pasarela Atirantada "La Rosa"**



<p><b>Spiral access cable stayed bridge</b></p>	<p><b>Spiral pedestrian/cycle bridge – North Road, Finglas</b></p>
	
<p><b>Proposed pedestrian cycle cable stayed bridge - Nine Elms Thames</b></p>	<p><b>Spiral access cable stayed bridge, Germany</b></p>
	

In terms of the environment, I would urge Irish Rail to minimize removal of trees and hedgerows as part of the DART+ project where there is significant infrastructure works and along the railway line in general. At Ashtown, there is significant greenery in the form of trees and hedgerows in the stables and along Ashtown Road. With the current plan this would be significantly disrupted. In particular, the removal of hedgerows along Ashtown Road seems unnecessary, in particular if the underpass is not used for pedestrians and cyclists.

### Removal of hedgerow along Ashtown Road



In the Preferred Option report it is stated that “the existing Ashtown Road south of the railway is to be reconfigured as a high amenity urban space.” On one of the calls hosted by Irish Rail as part of the consultation it emerged that this involved the placing of planters on traffic calming protrusions along the road. It is worrying that this is viewed as amenity, particularly in the context of the significant changes to (and access to) substantial local amenities is expected with the preferred option.

#### 5. Community engagement and decision-making process

While Irish Rail and their representatives have made themselves available to engage with the community via webinars, usually outside normal office hours and to an at times emotive audience, I think the format of engagement has not served to build trust with communities and others affected by the DART+ plans. For instance:

- Despite significant concerns raised from the first consultation regarding the safety of the underpass in option 2 at Ashtown, little effort was made in terms of design to alleviate those concerns with installation of CCTV being the main mitigant. As noted earlier CCTV appears to have limited deterrent effect on anti-social and criminal behaviour. In effect, the community felt that it’s concerns were not heard or respected.
- On close examination (as noted earlier in relation to option 9 at Ashtown) there appear to be inconsistencies with how the multi-criteria analysis (MCA) is applied across options and locations, which could lead to an interpretation that the process is being used to subjectively support an already identified preferred option. For instance, the moving of Spencer Dock station to the current preferred site on North Lotts<sup>16</sup> is identified as a positive in that rail users would no longer have to walk 350 metre through a quiet (albeit overlooked) stretch of canal or through a residential development. At Ashtown, a 320 metre journey through an isolated underbridge for rail and non-rail users for those who cannot

<sup>16</sup> Which is more costly but operationally more effective, compared to option 9 at Ashtown which is more costly (ruled out on that basis), but operationally inconvenient for a limited period.

use the pedestrian bridge is considered to have 'significant comparative advantage'.

- While retrospectively it can be seen in some of the many documents from the first consultation that Ashtown stables would be significantly affected option 2, Irish rail and their representatives were not transparent that this was the case during the first consultation.
- When wider community calls were held a significant amount of time (about 40 minutes) was dedicated to presenting details of the whole DART+ West project, whereas most people on the call were primarily interested in the detail of how it would affect their local area. Therefore, a higher level overview of the overall scheme and more time on the detail for the area in question on the call, allowing ample time for discussion could have improved engagement.
- While beyond Irish Rail's control, it would be helpful if future engagements would enable joint physical and remote/webinar engagement as part of consultations.

I think that going forward it would be helpful to engage with communities (such as community groups) and those living closest to the relevant works in between formal touch points such as consultations (if there are more) and the railway order application, to allow for both their input to the options and a better understanding from both sides of each others needs. This could be done also in combination with Dublin City Council and/or Fingal County Council to bring local policy and strategy more effectively into the process.

## **6. Other considerations**

### ***European Commission technical guidance on climate proofing infrastructure<sup>17</sup>***

Given the timing of this project it would appear that it falls within scope of the above technical guidance. Could Irish Rail confirm that this relevant assessment will be conducted and published?

### ***Location of proposed pedestrian bridge and lift***

The proposed pedestrian bridge at Ashtown under option 2 may obstruct access to the canal towpath heading west.

### ***Set down areas***

We recommend discussions with the local community and Dublin City Council on the position of the set down area on the north of the railway. It could potentially be moved north nearer the existing roundabout towards the River Road which would allow for an element of pedestrianisation to be brought into Rathborne Village.

On the north of the canal, moving the set down area so that it is aligned with the entrance to the stables could minimize the impact on the stables.



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[https://ec.europa.eu/clima/sites/default/files/adaptation/what/docs/climate\\_proofing\\_guidance\\_en.pdf](https://ec.europa.eu/clima/sites/default/files/adaptation/what/docs/climate_proofing_guidance_en.pdf)

**Revised road position for Mill Lane**

We note that the position of Mill Lane appears to have moved east to avoid the old mill, which impacts the stables more than would otherwise be the case (see pictures below).

Preferred option 2 - Mill Lane Route	Mill Lane - Current layout (blue) and preferred option layout (red)
	

It is not clear that all the buildings within the boundary of the mill are old as some (on the east) appear to be relatively new. Where a detailed review has not already been conducted it would be worthwhile understanding exactly which parts of the site need to be protected given the significant impact on the stables as a result. Also, it is also an opportunity for Fingal CoCo to engage with the owner to better maintain the protected structure which has had numerous fires in the last two years. It would be very unfortunate if an existing business/leisure facility was significantly impacted by a decision to avoid the mill only to have it fall into ruin due to continued neglect. Please see the maps below with the area in the red circle of interest. It appears that the (cream) building perpendicular to the road may be relatively new, but it is not clear what is the age of the building alongside Mill lane.

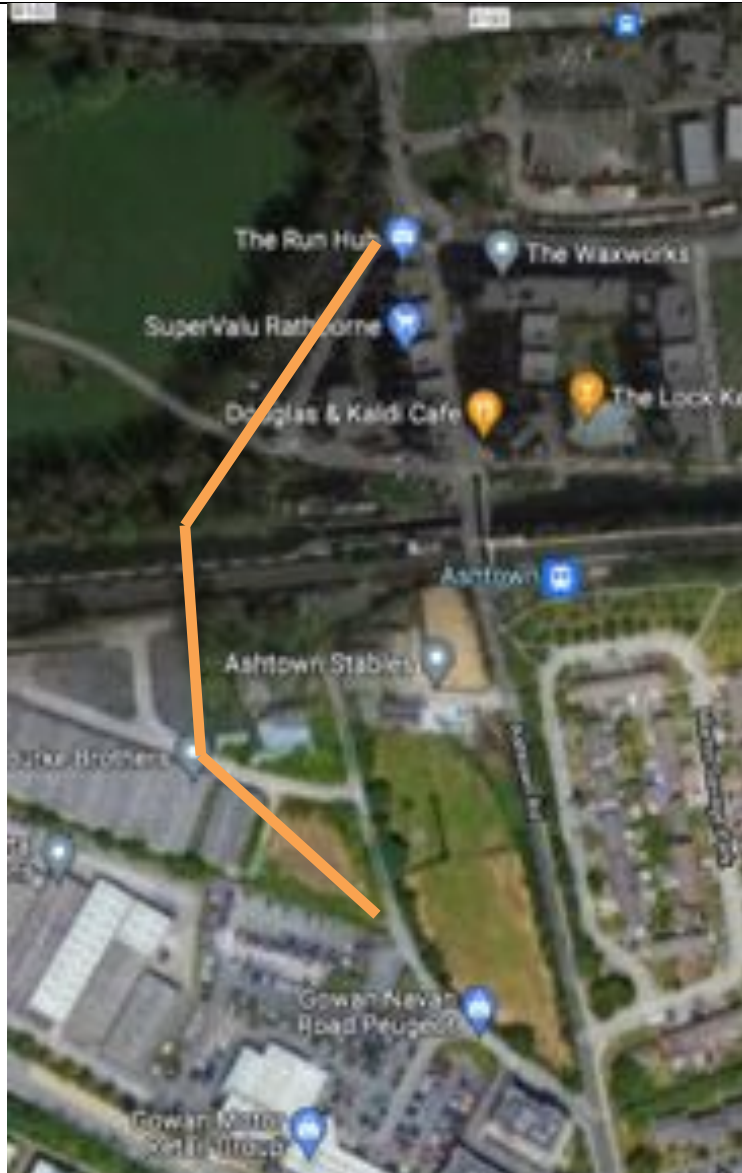
Current aerial map overlaid with 1888-1913 historic map (Source: Geohive)



***Alternative route for underpass - vehicles only***

As an example, where only completing a vehicular underbridge it could potentially be moved west where it could have less impact on green areas to the south of the railway, although its impact on green areas and protected structures to the north would need to be assessed.

**Possible alternative road route - vehicles only**



**Alternatives for construction sites**

Given the vocal objections to the CPO of the stables, could other construction sites be examined that would be less disruptive, albeit potentially more compact and with less direct access. See possibilities in the picture below?



In conclusion, I am supportive of the upgrade of the Dublin-Maynooth railway line and recognize that as a result the level crossing at Ashtown needs to close. However, this needs to be replaced with access across the railways for pedestrians, cyclists and vehicles, with the nature of access for pedestrian and cyclists such that it is safe and supports connectivity and permeability between north and south of the railway. Finally, it is important that the design of overground infrastructure is sympathetic to the local area.

If you have any areas on which you would like to follow up in relation to my submission, please contact me at [anna.lalor@gmail.com](mailto:anna.lalor@gmail.com) or on 086 824 1019.

Yours sincerely

Anna Lalor