

Planning, Station and Environs and Proposed Future Development

The proposed station and attendant development of the CIE Works threatens to radically transform our community. The Railway Estate is a remarkably quiet and green urban environment, whose buildings and layout still reflect the enlightened planning and design involved in its creation in the 1840s by the Great Southern and Western Railway.

The Estate is essentially connected to the Railway Works, as was intended when it was built. There is only one vehicle entrance at the site of the former gates on Inchicore Terrace South and one pedestrian entrance at the end of Inchicore Terrace North. The Railway Works, as currently constituted, means our community is a cul-de-sac; there is no road or foot traffic through the Railway Estate except to access the Railway Works.

The proposal for a station, however, fundamentally alters all this. CIE is explicitly arguing for greater permeability of the Railway Works site, necessarily involving massive increases in foot and vehicular traffic, with the attendant noise, disturbance and loss of security. This permeability requires a number of new access routes to the Railway Works site which have serious impacts on homeowners adjacent to the new or reconfigured access routes, as well as the whole communities of Kylemore Road, Jamestown Road, Ring Street, Tyrconnell Park, the Landen Road and the Railway Estate. CIE envisages a period, of indeterminate length, during which the Railway Works will be rationalised within a space north of the proposed station and all buildings south of the station, which have not been demolished, will be fenced off, exposing them to serious risk of dereliction.

Finally, the viability of the station, as proposed, depends on the development of the Railway Works itself, an area roughly twice the size of Temple Bar. Despite the momentous changes this means for our community, the entire surrounding area and Dublin city, there has been no consultation about this development and the location of the station, no planning documents of any standing have been produced and no vision of the sustainable development of the Railway Works site has been expressed.

We are asking that an Bord Pleanála make it a condition of the granting of the Railway Order that the Inchicore Railway Estate Residents' Association be recognised as a participating stakeholder in the planning process surrounding the siting of the station and its attendant

development. We ask this because of the extreme impact such development will have on our community and because of CIE's history of neglect, dereliction and unplanned development, as described in the following section. We further strongly propose that a fully detailed and implementable Master Plan for sustainable development of the Railway Works, sympathetic to its existing community and heritage be drawn up with the full participation of CIE, Dublin City Council and the Residents' Association before the Railway Order is granted.

CIE's Lack of Consultation, History of Neglect and Failure to Plan

It is vital that the Residents' Association is recognised as a stakeholder in the development of the Master Plan and that this plan is finalised before the station is sited and built.

Section 43(1) of the Transport (Railway Infrastructure) Act 2001 as amended by the Planning and Development (Strategic Infrastructure) Act 2006 sets out the matters that Bord Pleanála is required to consider before deciding whether to grant the order to which the application relates. These include: 'the likely consequence for proper planning and sustainable development in the area in which it is proposed to carry out the Railway Works and for the environment of such works.'(s. 43(1)(g)).

The history of CIE's concern for planning suggest that proper planning and sustainable development will not occur without the Residents' Association and other affected communities being given stakeholder status. CIE's proposals for a station and the development of the Railway Works have been elaborated and presented in an ad hoc and haphazard manner, with no reference or concern for their effects on the surrounding community.

First, DART Underground was not going to come to Inchicore, then, when terminating it at Heuston became inconvenient, a hasty plan to extend it to the Railway Works was developed. This plan was presented to residents very late in the process of preparing for DART Underground and any consultation with the community, however insufficient, was entirely due to concerted community initiative.

Initially, there were no plans for a station at Inchicore, then, suddenly, there were. CIE repeatedly denied any interest in developing the Railway Works until one month before the Railway Order was submitted, then the Master Plan by Murray O’Laoire Architects appended to the EIS, which has no legal standing, was presented to Inchicore on Track at a meeting with CIE. The representatives of Inchicore on Track were not permitted to take away a copy of the Master Plan for study. Although it is not an actual proposal for the development of the Railway Works, the Master Plan describes a vast development of mainly medium to high density buildings and includes a portion of the Railway Estate, where it is proposed to convert an area traditionally used for community gain into a high density development, to the severe detriment of the community as a whole.

The Great Southern and Western Railway showed inspired concern for harmonious planning and design and, as a result, created a unique industrial/residential complex, as noted by Dublin City Council in their submission to An Bord Pleanála (p. 16). CIE has not shown similar concern in the last few decades. They have pursued a concerted policy of neglect leading to dereliction, which they have then used as an excuse to engage in unplanned development.

In 1907, there were extensive green areas used as allotments and the area bounded by George’s Villas, Inchicore Parade and the Social Club was laid out with paths and trees as a designated community park. Long term residents still refer to this area as the ‘Pond Field’ because there was, in fact, a pond that adjoined the Social Club and that formed part of this park. In recent decades, CIE has allowed this area to deteriorate into an ill-defined parking area demarcated by hard core. North and east of this area, CIE sited the Permanent Way Compound next to the Filter Beds after the completion of the Third Track Works in 2004. When the Permanent Way Compound and the Third Track project were being developed, promises were given that full reinstatement of the historic limestone walls would occur. In fact, the reinstatement was characterised by a poor standard of work and unsuitable and inferior materials.

The Permanent Way Compound and the Filter Beds are surrounded by palisade fencing, topped with barbed wire. The Permanent Way Compound is a complex of portacabins on land zoned Z9: to preserve, protect and improve recreational amenity and open space and green networks. Despite the poor construction and maintenance of this site, CIE took years longer to build it than the proposed building time of eighteen months. Elsewhere, the historic dormitory

and handball court for engine drivers were allowed to deteriorate, which led to their subsequent dereliction and demolition. The developer of the building that replaced them, Wheaton Court, added on an extra storey to the structure that was approved by the planning authority.

Given this history of neglect, dereliction and unplanned development and CIE's failure to comply with the conditions for past development, we cannot expect that the conditions agreed between CIE and DCC will be complied with in a way acceptable to the community, faithful to the historic character of the estate or consonant with best planning practice and sustainable development.

In particular, we fear the conditions spelled out in DCC's 'Agreed Position' with CIE will not be met, including Condition 1 (monitoring and disputes); Condition 4 (suitability for materials for the existing character of the area) and Condition 101 (mitigating traffic). We note, with dismay, that the Agreed Position between CIE and DCC takes no account of residents' concerns about security, traffic and noise involved in the operation of the station. Indeed, it is unclear, in both the Master Plan and the agreement between CIE and DCC, who is responsible for future development. DCC claims a Master Plan should be prepared, while CIE devolves all responsibility for future planning onto DCC and the contractor. Given the failure of CIE to plan and live up to its commitments and the failure of DCC to enforce these commitments, it is essential that the Residents' Association be given a participatory stakeholder role in future development of the Railway Works, as is required by best practice both for good, sustainable planning and for the development of a successful, smart and well integrated urban environment.

Proposed Station under the Railway Order

Although CIE is interested in separating the Railway Order from future development, we submit, for the Bord's consideration, that what is proposed in the Railway Order itself has direct implications for the future development of the Works. CIE's plans for the Railway Works follow this familiar pattern of neglect, dereliction and poorly planned development.

The proposed siting and construction of the station as part of DART Underground envisages several years of construction, in which some of the buildings of historic interest that form part of the integrated fabric of the old Railway Works will be demolished and others will be fenced off, placing them at substantial risk of neglect and dereliction. This is in contradiction to

CIE's claims that the proposed station at Inchicore will be 'framed with buildings of historic character'. (EIS, vol. 2, 3-14) The proposed construction will involve the building of new installations, most significantly the ESB substation, that have been sited with no concern for the existing community and which preclude effective planning for future development. The ESB substation is sited, unnecessarily, within 35m of homes on St. Patrick's Terrace and will produce unacceptable levels of noise, electromagnetic interference and danger of fire or explosion. (On this, see Chapter 5 of Inchicore on Track's submission, p. 44)

Further, and contrary to good planning, the siting of the ESB substation and other construction involves a great deal of wasted space, both during the initial operation and in the development phases. As proposed, there is a grave danger that once completed and operational the station will be an island in a derelict post-industrial wasteland, accessible only by long access roads and pedestrian walkways. We want a guarantee from CIE that this will not happen.

As proposed, the station has been sited with no concern for planning at all. It is over one kilometer from the centres of the villages of Inchicore, Bluebell and Ballyfermot. As the EIS notes, unlike other proposed stations, the station at Inchicore 'is not in a city centre area. It is located in the middle of what is currently an industrial site.' (EIS Vol. 2, 3.4.2.2, p. 3-12) Its immediate environs will be, to the north, the rationalised Railway Works and, to the south, the fenced off remains of the historic Railway Works buildings. As proposed, passengers embarking at the station will either have to travel long distances on foot through these fenced off areas, often through narrow passages, or be delivered by car. If by car, the potential for the use of the surrounding communities as informal park and rides is great. The proposal to rationalise the Railway Works seems to involve moving the security barrier at the existing entrance to the new entrance over a hundred metres inside the works. This will almost certainly lead to Inchicore Parade and surrounding streets being used as an informal park and ride. CIE's withdrawal further into the Works also presents a serious risk of anti-social behaviour, as the spaces between the abandoned Works buildings to the south of the station tempt joy riders to ditch and burn stolen cars. Perhaps, they will then take advantage of access to the station and leave by train, as frequently occurs along the LUAS line in Inchicore. Since much of CIE's strategy to combat anti-social behaviour depends on avoiding 'a poorly designed built environment' (EIS, vol. 2, 3-48) and providing 'a pleasant and well-maintained designed environment' (3-49), the fencing off

of buildings and the access routes proposed directly threaten users with negative social consequences. All pedestrian access routes involve multiple turns around these fenced off structures and so violate the principle of good design to reduce anti-social behaviour, noted by CIE. There, CIE notes that designs of stations should include 'Effective urban landscaping which provides clear lines of sight without obstructions and avoids the potential for dark or hidden spots.'(3-50)

The proposed station involves the opening of existing access routes from Sarsfield Road, Kylemore Road, Tyrconnell Park and Inchicore Parade to the public, but also proposes opening an access route behind the houses on Abercorn Terrace and St. Patrick's Terrace and provides for 'future bridge expansion to north of rail line' from the station to Landen Road. Although it is provided for, it is not clear that the impacts on the residents of Landen Road have been fully considered or what kinds of property will need to be acquired to provide such access. The impacts of the road access from Inchicore Parade have not been adequately considered and no serious mitigation measures have been proposed.

As described in OTB Engineering's submission, another station location should be considered, close to the Kylemore Road. As noted by OTB, the proposed siting of the station is determined by the potential for future development and the costs to Irish Rail of acquiring some new land, not by the demands of good planning or transportation needs. Such a station location would bring a number of benefits, directly addressing our concerns. It would involve the demolition of fewer historic railway buildings. It would be cheaper to construct and would permit deeper tunneling through Inchicore. Most important, it would provide significant gains in terms of passenger usage, by serving Ballyfermot, the centre of which is far from the proposed station. If the future development of the Railway Works is indeed outside the scope of this application, then the proposed station location does not make any sense and clearly does not constitute proper planning. If the goal is to serve Inchicore, rather than Ballyfermot, then a number of other locations, close to the centre of Inchicore, should have been considered. There is no evidence that any such locations have been considered by the applicant.

The proposal, in its current form, explicitly describes how the proposed station will tie in to the Kildare Route Project and the proposed future LUAS stop as beyond the content of this application,. The proposed station is characterised as a terminus station(3-43), whereas the

original reason for extending DART Underground to Inchicore was to provide a turnback facility and to integrate DART Underground with the line to Hazelhatch. The proposed station at Inchicore would then be a node on a continuous line, rather than the terminus of a short and ill-connected inner city subway. Disingenuously, CIE's projected passenger figures justifying the station at Inchicore are based on the 'node' version of the station rather than the 'terminus' station applied for in the Railway Order, since they base their figures for passenger demand on the 'Do-Something Scenario 3, Transport 21 Proposals plus Kildare Route Project 2'.(3-44) Not only does this render the application for the Railway Order misleading, but it has dire consequences for our community. A terminus station is a feeder station, whose only role is to collect passengers. Not surprisingly, DCC urged CIE to consider a park and ride at Inchicore. Although no formal park and ride is planned for the station, the Railway Estate will become an informal park and ride, with all the pressures on parking and disturbance that implies.

Further, this 'project splitting' falls afoul of the EU's Environmental Impact Assessment Directive (85/337). The Court of Justice has interpreted the Directive in such a manner as to render piecemeal examination of a project contrary to the EIA Directive. Accordingly, the applicant's claim that the Kildare Route Project is outside the scope of this application is contrary to the directive, as is their failure to consider the cumulative impacts of DART Underground and the Kildare Route Project. We submit that the proposed station location is essentially related to a future tie-in to the Kildare Route Project and that both projects should have been included in the EIS and considered together in this hearing. Similar concerns apply to the proposed LUAS line station that has also been proposed for the Railway Works.

In the absence of proper planning which considers all of the relevant projects and sustainable development, the station, as proposed, will remain isolated from the communities of Inchicore and Ballyfermot and, accordingly, unviable. The potential for dereliction of most of the Railway Works will foreseeably persist for decades, at least until demand recovers for apartments and commercial spaces on the enormous scale envisioned by CIE's Master Plan. When this development occurs, as it must eventually, CIE's Master Plan envisages a replication of the failed high density developments of the recent boom, with no consideration of their failure or of their potential effects on the community of the Railway Estate or of the wider communities of Inchicore and Ballyfermot.

Good planning, even simply in the case of the construction proposed in the Railway Order, requires that the design and siting of the proposed station and the plans for development of the Works site be considered together, as an organic whole, and that construction of both station and development proceed at the same time.

This would have the additional effect of reducing the impact of a prolonged series of constructions on the residents and would create a better planned, more sustainable urban quarter, properly integrated with the existing community. Only such an integrated process anticipates future developments in the site and community and can minimise negative consequences and seize future opportunities. Only such a process can be described as ‘future proof’, as required by good planning and as envisaged by the Transport (Railway Infrastructure) Act 2001.

Implications for the Railway Estate

The sad future envisaged by CIE for the Railway Works has many unacceptable implications for our community. Even though CIE’s predictions for the future use of the station are unreasonably optimistic and based on a false model of the station’s role, as noted in the last section, the operation of the station will nevertheless create a considerable rise in traffic and footfall in our once quiet neighborhood. This will be particularly true on match days for St. Patrick’s Athletic, when rival supporters will encounter each other as they stream towards Richmond Park. Worse, the much vaunted permeability will lead to even more footfall unrelated to the station as people take advantage of the new possibilities of walking through the Railway Works and Estate. This raises serious security concerns, which are poorly addressed in the EIS. The EIS description of mitigation measures for the ‘socio-economic’ consequences of the station amount to installing CCTV, unspecified design measures to ‘minimise the risk of anti-social behaviour or loitering’ (25-42), promises to coordinate with an Garda Síochána, ‘adequate, but unintrusive lighting’ and signs ‘reminding’ users to respect the privacy of residents.(25-43)

We have not been shown these foolproof design measures and we do not share CIE’s confidence in the power of signage. We suggest that unintrusive security lighting is an oxymoron. What is clear is that the new permeability of the Railway Works and Estate will lead to a rise in anti-social behaviour, especially for the residents of Abercorn Terrace, St. Patrick’s Terrace, George’s Villas, West Terrace, Inchicore Terrace South, Inchicore Square and Inchicore

Terrace North. Residents of Abercorn Terrace, St. Patrick's Terrace and George's Villas will be forced to choose between obtrusive lighting and security, even if the effectiveness of the lighting in combating anti-social behaviour is questionable.

As a condition on the Railway Order, we propose more robust security measures. These include CCTV coverage of the entire Railway Works site, rather than simply the station (See 3-50), a permanent security presence at the station rather than a 'random' one (See 3-50) and community policing measures by an Garda Síochána. Similarly, CIE's proposals to deal with increased volumes of traffic and increased need for parking are grossly inadequate. CIE only plans to 'monitor' parking usage and to 'consider' supporting residents' requests for parking restrictions 'where necessary' (25-43).

Finally, the noise coming from the station during operation has not been considered. Residents are already being disturbed by sounds of operation (friction, announcements) from the LUAS at Black Horse. They will receive considerably more disturbance from an unmitigated and uncovered station a few metres from their doorsteps.

We demand that the cumulative impacts of noise, vibration, litter, privacy, traffic and security, both in construction and operation, be considered in deciding on the location and design of the station. In particular, we demand that the station be designed to mitigate noise and light concerns and include effective security modifications. These cumulative impacts must also include the impacts of the Kildare Route tie-in and the proposal to site a LUAS stop on the Lucan Line within the Railway Works.

CIE's Failure to Plan

This lack of joined up thinking with regard to other proposed rail developments is typical of CIE's unthought-through approach to construction and development. In keeping with their recent failure to plan, CIE has presented no serious plan for the station and the development of the Railway Works. In their own words: 'The purpose of the Draft Urban Design Framework is to set out how the site could be developed. It is not intended as an indication of what development will take place.' (EIS 4-25) All they are saying is that they plan to plan. The past experience of the community is that this has not been the case. Flouting the very role of this hearing, they constantly defer all planning issues to the future: 'None of the development

envisaged in the Draft Urban Design Framework is included in the Railway Order, or as part of the proposed DART Underground. Any development that may occur in the future will follow normal planning procedures.’ (4-26)

Although they have included claims, in their appended Master Plan, that they intend to preserve historic buildings and provide open spaces, their proposed demolition and dereliction of historic buildings during construction and operation belie these claims. Buildings scheduled to be demolished include the Fleet Overhaul Shop and Smithy. All other buildings south of the DART Underground line are to be fenced off and ignored.

Our experience in dealing with CIE as a community suggests that even these claims will not be honoured and we should anticipate unplanned, unsustainable and, ultimately, unviable high density development.

As noted in our submission on architecture, CIE is not even committed to building the station to the specifications depicted in its architectural submission. Regardless of what one thinks of the drawings presented, it is not clear this is the station the community will get. Any development on this scale requires real proposals that will permit sustainable development and viable communities, evaluated in terms of the best international practice concerning planning and design.

Accordingly, we strongly propose similar planning status for any development of the Railway Works, along the lines of other major urban area redevelopment projects like Temple Bar, Docklands and Grangegorman.

Property Development and Economic Development

Who will benefit from this unplanned development of a site on the scale of the Docklands, twice the size of Temple Bar? CIE alone.

Despite the vague pronouncements by Alan Whelan and Craig Bullock, we, the residents, believe the proposed station and development of the Railway Works will be detrimental to the regeneration of Inchicore and, accordingly, are in conflict with the Inchicore Framework Plan.

Whelan and Bullock see the proposed station and the redevelopment of the Railway Works simply in terms of 'increased footfall', which they assume will stimulate the local economy, an economy that currently suffers from hasty, unplanned housing development and empty, poorly planned commercial spaces attached to that housing. While increased footfall, with all its problems, in the Railway Estate is a certainty, it is not going to help the village centre of Inchicore. The users of the station from the Inchicore side, in the absence of development, can only be the residents of Inchicore, whose footfall has not been sufficient to make those empty commercial spaces viable. Accordingly, any economic benefits to Inchicore village can only come from the development of the Railway Works site itself.

This development, however, will undoubtedly include commercial spaces of its own, as is envisioned in CIE's Master Plan. The proposed station is 1100m from Inchicore village, 500m of which is within the confines of the Railway Works. Considering the proposed commercial activity inside the development itself, it is most unlikely that the new residents of the as yet unplanned development of the Railway Works site will contribute to the economic development of Inchicore village.

Indeed, the more successful the commercial areas of the developed Works site are, the longer the shadow they will cast on the commerce of Inchicore village. Rather than breathe new life into Inchicore and Ballyfermot, as is envisioned by the Dublin City Council Draft Development Plan 2011-2017 and the Inchicore Urban Framework Plan, the proposed development, unsustainable in itself, will kill off the existing, struggling, local enterprise.

We note that both the Dublin City Council Draft Development Plan 2011-2017 and the Inchicore Urban Framework Plan were developed with some community consultation, whereas the Master Plan proposed by CIE has been withheld from the public until the last minute and involves no community consultation or participation at all.

In the absence of sustainable planning in which the station and proposed development are conceived as a whole, it is not clear that the station will create sufficient commercial activity in the Railway Works site itself. Other railway stations—like Cherry Orchard or Baldoyle—or LUAS stations—like the stations along the Davitt Road near the Railway Works/Estate—have not led to economic development. Indeed, the unregulated speculation and indifference to

planning that characterised the boom has led to many viable industrial spaces along the Davitt Road being bought by developers, who then razed them, leaving that long stretch of canalside land an unsafe, unused wasteland which attracts graffiti and vandalism.

Finally, the proposed future development of the Railway Works site deliberately effaces the existence of a vibrant community that is essentially connected with the site, the Railway Estate. In Murray O'Laoire's proposed Master Plan, all of the borders of the Railway Works site in every direction are carefully identified and named, with one exception: the Railway Estate to the east. In his response to submissions, Eddie Feeley refused to acknowledge the existence of the Railway Estate, suggesting that this is only our 'conception' of 'the area adjoining the CIE Works'. (Feeley, 7.2.2) Our community has a substantial stone wall surrounding it and the remains of the gates at its entrance are still visible. It has a connection to the Railway Works extending back over 160 years. To downplay that history is a substantial threat to our well-being and a crucial failure to acknowledge our stake in any development of the Railway Works site.

Conclusion and Conditions

CIE takes pains to stress that the proposed development of the Railway Works is entirely separate from the Railway Order and in no way represents a commitment to the community of the Railway Estate and beyond to engage in sustainable, long term planning, despite this being a requirement of the relevant legislation. CIE's proposal emphasises what is not in the Railway Order, rather than what is and what should be if they are to live up to their legal and corporate responsibilities.

What is needed is a proposal for well-planned and sustainable development, complete with delivery mechanisms, construction details, guarantees to the community, clear statements of impacts with proposals for their mitigation and commitments to a particular quality of construction. CIE emphasises that any vision that has been projected here in this hearing bears no relation, material or architectural, to the final product the residents of our community will have to live with for decades. Although they would like to give the appearance of having a vision for the future station and development of the Railway Works, they have merely rented some vision and explicitly deny that this vision will necessarily be pursued. Their honest confession of their

lack of vision is not all to the bad, since the vision proposed in the appendix to the EIS is of an unsustainable, high density development.

We reject this development from the boom-time past because it intrudes on a settled community that is essentially related to the Railway Works site, our community.

Our community, on the other hand, does possess a vision of what the Railway Works, an integral part of our community, could be. We are clear about what we do not want and what we do want. We do not want:

1. A station that is sited in an unacceptable location in an unacceptable way, to the detriment of existing residents and the existing Railway Estate community.
2. A 'Master Plan' for the Railway Works that involves the threat of planned neglect and dereliction.
3. Unplanned, high-density development that harms the Railway Estate community and the wider community of Inchicore.

We urge the Bord to make conditions prior to the granting of any Railway Order:

1. Recognition of the Residents' Association as a participating stakeholder, with CIE and DCC, in any future development of the Railway Works.
2. Planning Status for any proposed redevelopment of the Railway Works similar to that of other large urban projects, as befits a development of this size and importance.
3. A real Master Plan that takes into account the existing community of the Railway Estate and the historic significance of the Railway Works/Estate. A Master Plan developed in partnership with the community, before and as a condition on the Railway Order. A Master Plan that constructs the proposed station and any future development together as part of an integrated whole.
4. A Master Plan for the development of the Railway Works site that emphasises best practice in planning, the principles of sustainable development, community participation, corporate social responsibility and partnership.
5. Real and specific mitigation measures for the inevitable consequences of the station for the security and tranquility of residents, including cumulative impacts of

construction and other related installations, including the Kildare Route tie-in and proposed LUAS Station.

6. A feasibility study of the potential for development of the Railway Works as a railway heritage site.

We are not opposed, as a community, to public transport or to sustainable cities. Unlike CIE, we have a vision of what a sustainable city could be, a vision developed either through generations of living in this urban oasis or through choosing to live there, once discovered.

Our vision of the new community of the Railway Estate and the regenerated Railway Works involves:

- A commitment to the railway heritage of the Railway Estate/Works, in the form of a railway heritage site connected to existing local heritage sites
- A commitment-to well-planned open spaces, both in the Works and the Estate, that represent community gain
- A commitment-to a less dense and more sustainable urban village that features a harmonious relationship to transport, existing commerce and the environment, expressed through provision of allotments, green spaces, real mitigation of harmful effects and an urban farm.

We have this vision because this is our home and we strongly urge the Bord to acknowledge our vision and our stake in our community, by making acknowledgment of our role as stakeholders a condition of the proposed Railway Order.

In demanding the right to participate in developments that threaten to radically alter our community, we are not asking for anything special. What we want for our community, we want for all communities affected by DART Underground: a meaningful opportunity to participate in planning developments that will forever alter our lives, our homes and our communities.