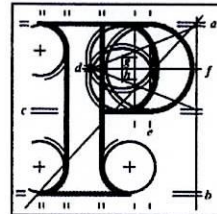


Our Case Number: ABP-312131-21



**An
Bord
Pleanála**

Garrett McGuinness
Iarnród Éireann
Senior Track & Structures Engineer
Pearse Station
Westland Row
Dublin 2
D02 RV00

Date: 03 October 2022

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility
Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of Fingal County Council and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

PA04

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Eimear Reilly

From: Eimear Reilly
Sent: Monday 3 October 2022 13:23
To: Garrett.McGuinness@irishrail.ie
Subject: RE: Iarnród Éireann Observation Submission 312131-21 - Greater Dublin Drainage Project

Hi Garrett

The Board acknowledges receipt of your email.

Kind regards

Eimear

From: Garrett McGuinness <Garrett.McGuinness@irishrail.ie>
Sent: Friday 30 September 2022 11:06
To: SIDS <sids@pleanala.ie>
Cc: David Gannon <David.Gannon@irishrail.ie>; Nick West <Nick.West@irishrail.ie>
Subject: RE: Iarnród Éireann Observation Submission 312131-21 - Greater Dublin Drainage Project

Dear Sir / Madam,

With respect of the above proposed development please find attached our comments and observations pertaining to our review of the planning documentation. If you have any comments or require any clarifications or additional information please do not hesitate to contact me.

Regards,

Garrett McGuinness
Chartered Engineer, BEng(Hons) MSc Dip. Eng CEng MIEI
Senior Track & Structures Engineer's Department,
Iarnród Éireann, Pearse Station, Westland Row, Dublin D02 RV00
☎ + 353 1 703 4597 ☎ 087 6501548 ✉ garrett.mcguinness@irishrail.ie www.irishrail.ie



An Bord Pleanála,
Strategic Infrastructure Development Section,
64 Marlborough Street,
Dublin 1,
D01 V902

Date: 30 September 2022
Our ref: 3237/22/9
Your ref: ABP-312131-21

Re: Greater Dublin Drainage Project consisting of a new wastewater treatment plant, sludge hub centre, orbital sewer, outfall pipeline and regional biosolids storage facility in the Townlands of Clonshagh, Dubber and Newtown, County Fingal and Dublin City.

Dear Sirs,

In relation to the above proposed Development, I wish to advise that on behalf of the Board of Iarnród Éireann, a Prescribed Body under the Planning & Development Regulations 2006, Article 28.(1).(j & w), we would like to make the following observations:

- 1) The Railway Safety Act 2005 places an obligation on all persons carrying out any works on or near the railway to ensure that there is no increase in risk to the railway as a consequence of these works. Due to the nature of the work and the proximity of the site to the Railway, the Applicant must take into account this obligation in Design, Construction and Operation of the development. The proposed development has the potential to significantly impact the safety of the operational railway. The Applicant must engage with Iarnród Éireann seeking advice on technical requirements for mitigating impacts on railway infrastructure and operations.
- 2) The proposed sewer installation lies directly adjacent to and under the Dublin - Belfast Railway line between underbridge UBB20 to the South and overbridge OBB21 to the North. The site boundary shown on the plan drawings assumes that the property boundary to railway lands corresponds with OSi mapping. This approach is unreliable and does not take account of the historical drainage channels running parallel to the railway at the crest of the cutting which fall within the original land take for the railway corridor. It is therefore probable that the proposed development encroaches onto CIÉ/Iarnród Éireann lands. It is noted that the drawings provided by the applicant under the heading of 'Trenchless Crossing Dublin-Belfast Railway' Drawing No 32102900-2112 does not specify dimensions between the proposed access chambers and the track, or alternatively GPS coordinates that would allow for comparison with the Railway's records for the boundary line along this section. The Applicant should engage with Iarnród Éireann

and provide detailed cross sections with a view to agreeing the position of the new access shafts.

- 3) The proposed orbital sewer pipe and any ancillary services that are required to cross along, over or under the railway must be the subject of a licence agreement with Iarnród Éireann / C.I.É. All lands directly under the railway are in CIÉ/Iarnród Éireann ownership and all proposed works in these areas are subject to agreement with, and require written consent from, CIÉ/Iarnród Éireann. This is clearly set out in Section 46 of the Railway Clauses Consolidation Act 1845.
- 4) The DART+ Coastal Project (Northern Line) is underway and is currently at Phase 2 Project Concept, Feasibility & Option Selection. The works will involve track modifications to improve capacity, the installation of trackside overhead line equipment, construction of electrical substations including access roads, modifications to rail bridges, and any other modifications required to existing permanent way or railway systems infrastructure. An optioneering study to determine those works is on-going and this may determine the requirement for railway infrastructure additions or modifications in the vicinity of this proposed development. As a consequence of the estimated land take required to facilitate a works corridor for the track and bridge upgrade, no construction of access shafts should take place within an area 25m East and 40m West of the nearest running edge of the rail without the written permission of Iarnród Éireann, refer to Figure 1 below.
This includes the positioning of any access road, Soakholes / Percolation areas. Irish Water should consult with IE in relation to the output of this option selection study together with all other aspects of the DART+ Coastal Project.

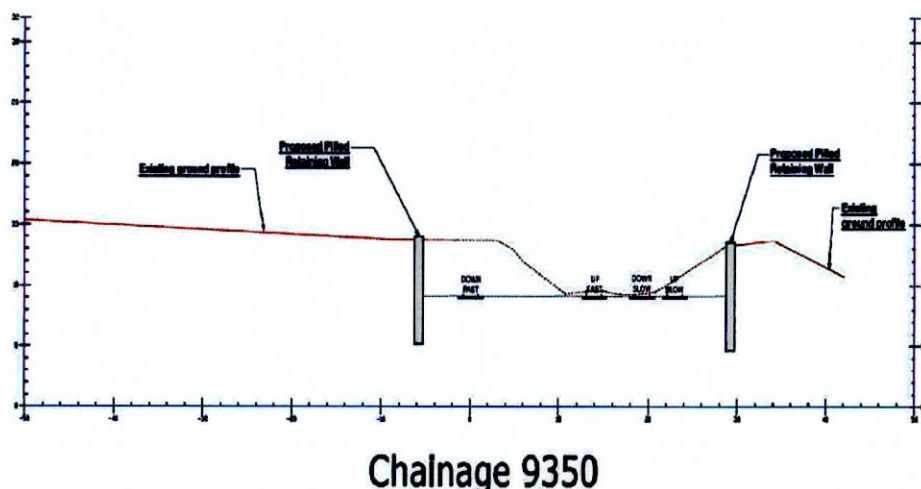


Figure 1 - Proposed Four Track Section looking North at Lands at Drumnigh.

- 5) The integrity and functionality of any existing historical drainage channel running parallel to the railway at the crest of the cutting must not be affected by any temporary or permanent works. Iarnród Éireann have had serious instances of slope failure in the past due to third party works at the crest of cuttings. Photo 1. below shows an example of a derailment in Co. Wicklow caused by third party works at the crest of a cutting.



Photo 1 - Derailment in Co. Wicklow caused by third party works at the crest of a cutting.

- 6) The development may not undermine the integrity of the embankment supporting the structure UBB20A (a culvert) and Overbridge OBB21, for which Iarnród Éireann has a statutory obligation to maintain.
- 7) The structure, approach and embankments to OBB21 are in full ownership of CIE. This is clearly set out in Section 46 of the Railway Clauses Consolidation Act 1845. Any works proposed to the approach road and embankments adjacent to the bridge including resurfacing, landscaping, laying of ducts or services etc will require written consent from CIE/Irish Rail. In addition, OBB21 shall not be used by heavy, large or unwieldy construction equipment or vehicles to cross the track.
- 8) Provision must be made for maintaining the security of the railway boundary during the proposed sewer installation.
- 9) Access for Iarnród Éireann staff to culverts / bridges under the Railway should not be hindered.

- 10) No additional liquid, either surface water or effluent shall be discharged to, or allow to seep onto, the railway property or into railway drains / ditches.
- 11) Should the development require the use of a crane that could swing over the railway property, then the Applicant must enter into an agreement with Iarnród Éireann / C.I.É. regarding this issue.
- 12) No overhang of any part of construction plant or equipment over the railway property is to be allowed.
- 13) Lights from the proposed work, either during the construction phase or when the installation is completed, should not cause glint or glare or in any way impair the vision of train drivers or personnel operating on track machines.
- 14) It should also be noted by the Applicant that a height restricted bridge under the railway exists on the R123 (Mayne Road). The clearance beneath underbridge UBB20 is approximately 3.85m. During the construction phase of the project, a proper traffic management plan should be drawn up to prevent construction traffic from having to traverse under bridge UBB20. The Applicant must ensure that no over-height vehicles attempt to pass under this bridge and that the routes for all high vehicle movements are planned. A fuller listing of our bridges can be found at the following web site <http://www.irishrail.ie/about-us/infrastructure>.
- 15) Prior to any works that could disrupt road traffic being carried out in the vicinity of railway underbridge UBB20, the Roads Authority of Fingal County Council shall comply with its statutory duty under Sections 113, part 1, 2 and 3 of the Railway Safety Act 2005 and provide Iarnród Éireann with 21 days written notice of intended works. Accordingly, the Applicant will have to provide sufficient notice to the Roads Authority in order to do this. Therefore, the Planning Authority may decide to condition the Applicant to provide sufficient notice as contravention of this section of the Act could lead to prosecution of any person in the Roads Authority who is found to be in breach of this statutory requirement. Section 113 refers to fines and offences under the Act.
- 16) A comprehensive and detailed ground site investigation/report and works design statement must be carried out prior to detailed design stage. The report will be factual and specific to the proposed work being undertaken. The design statement must reference any risk (both short and long term) associated with heave, settlement or any other process which may result in improper alignment of the railway track due to the proposed work. This report is to be issued to IR for review and comment prior to the detailed design stage of the proposed works.

These observations are made in the interests of safety in operation of the railway, and we recommend that the above points be made to the applicant and be a condition of planning should the planning application succeed.

Yours faithfully,

A handwritten signature in blue ink, appearing to be 'PP' followed by a stylized, cursive signature.

D. Gannon

Senior Track & Structures Engineer