

20221027-ABP-314232

An Bord Pleanála 64 Marlborough Street Dublin 1

Sent by email to: bord@pleanala.ie

27th October 2022

Ref:

314232

App:

Córas Iompair Éireann

For:

DART+ West Railway Order - Dublin City to Maynooth and M3

Parkway Railway Order Application

A Chara,

Thank you for referring the above railway order application to An Taisce for comment.

We welcome the overall proposal as it is a strategic priority for the improvement and expansion of the public transport network in and around Dublin.

The proposal needs to be integrated with a wider transportation initiative for the catchment area to reduce private car use and dependence, including promotion of cycle-and-ride to use railway stations.

Note on boundary treatments

We wish to make a general recommendation on boundary treatments. In each of the locations listed below and other visually sensitive locations, Iarnród Éireann is proposing the installation of palisade fencing for security purposes. An Taisce would view palisade fencing as primarily an industrial product and therefore inappropriate for use in the vicinity of the Royal Canal, which has many protected structures. Therefore we recommend that an appropriate alternative boundary treatment, such as painted steel railings, which have been installed extensively at the recently opened Pelletstown station, be selected in the place of palisade. For stretches of Dart + West, along the Royal Canal, we also recommend that visually less intrusive and more appropriate dark coloured Paladin Fencing, be selected instead of the industrial bright silver Palisade system.

Broombridge Rail Bridge - Demolition and rebuilding

The proposed reconstruction of this historic railway bridge of c.1845, is undesirable. It is described in the National Inventory of Architectural Heritage as having: "Random coursed squared calp limestone walls with shallow piers flanking each arch having limestone ashlar

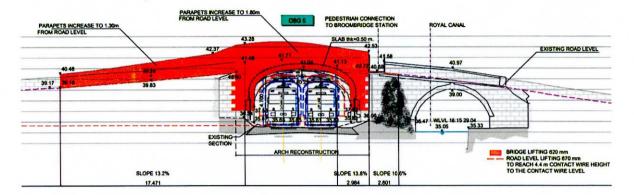
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plat-band to the base of parapets and limestone ashlar coping. The elliptical arch to the train bridge has rusticated limestone ashlar voussoirs and skewed squared calp soffit." Under the current proposal the historic character of this bridge ensemble will be irreparably affected.



In addition, raising of the roadway height of this bridge by 60cm will also lead to the steepening of the maximum falls of the roadway and footpath from, the current 6% to 8%, which would not be acceptable for use by cyclists (under the European Cycle Highway Manual) https://cyclehighways.eu/) and would also not be acceptable for use by pedestrians or wheelchair users under the Part M of Irish Building Regulations.

We would therefore recommend that the applicant re-consider the current proposals and the cost and impacts generated through the demolition of this historic bridge and replacement with a stone clad concrete replacement, just to achieve bridge lifting of 60cm.

It is our considered view that the far preferable alterative (from all of the perspectives listed above) should be to follow the lead of Network Rail in the UK and be to employ a combination of track lowering, and the installation of a reduced height overhead line equipment (OHLE). This sustainable alternative is both many times cheaper and quicker, it also avoids causing any disruption to both rail operation, but also pedestrian, cycle and vehicular traffic.

This method has been used extensively and successfully around the British Rail network as part of electrification upgrade programs. Similar to Dart + West, in order to retain historic bridges, where there was in sufficient head height available, as in this example in Bath - please see the attached link here: https://www.networkrailmediacentre.co.uk/news/in-numbers-record-breaking-track-project-successfully-completed-at-bath).

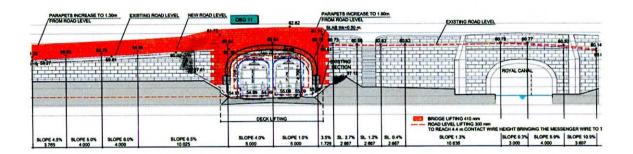
Finally, from an architectural perspective, should bridge re-building proceed, we also recommend that high-quality, durable materials with translucent or transparent balustrades be used to raise the bridge parapet heights to both 1.3m and 1.8m that differentiate contemporary interventions from the historic stonework.

Castleknock Rail Bridge - Demolition and rebuilding.

Rather than demolish and rebuild this historic structure (dated 1845), to achieve an extra height of just 40cm, we recommend that the better and sensible alternative of the combination

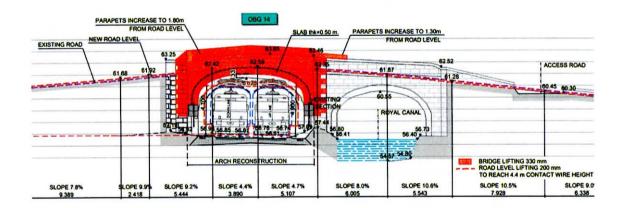
of track lowering, and the installation of a reduced height overhead line equipment (OHLE) be adopted, for the reasons explained in the previous entry for the Broombridge Rail Bridge.

The change of design and construction approach here is especially important with regard to how critical this bridge is to road transport and active travel infrastructure.



Leixlip Confey Station Rail Bridge - Demolition and rebuilding.

As a better alternative than to demolish and rebuild this historic structure from 1845, to achieve an extra height of only 30cm, we recommend that the combination of track lowering be followed, and the installation of a reduced height overhead line equipment (OHLE) for the reasons explained in the previous entry under Broombridge, be adopted.



Coolmine - New Pedestrian / Cycle bridge

From the Coolmine level crossing and across the canal bridge, one can see that both the design and the alignment of the bridge on the northern bank of the Canal would be crucial to the successful implementation of this project. We would recommend that the project team consider retaining as many of the mature trees as possible and endeavour to preserve the rich ecology of the canal bank here, thereby retaining this location's semi-rural character by carefully re-aligning and/or flipping the proposed ramping of the bridge and associated vertical supports several metres towards Sheepmore Lane, so as to allow for this retention.

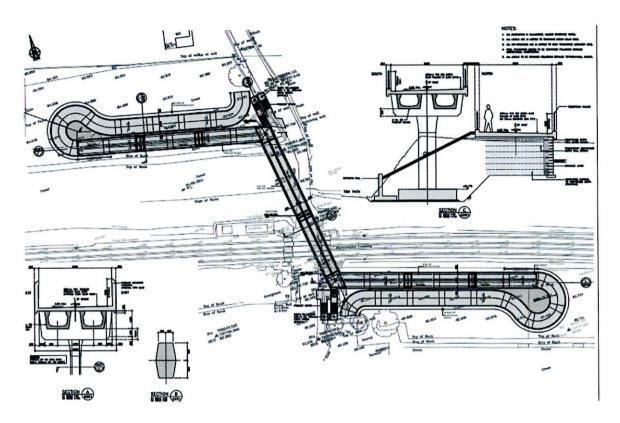


We note that he design and construction detailing of this bridge has been amended in to be a *COR-TEN*® clad lightweight steel structure, which we had recommended in our previous submission, which is welcome.

Finally, in order to comply with the ethos of universal design and the fact that Irish Rail are currently installing lifts around the country as part of the 'Big Lift' we recommend accessible lifts be provided.

Porterstown - Level Crossing closed / New Pedestrian / Cycle bridge

As per our comments on the proposed bridge at Coolmine, we would recommend that the alignment of bridge ramping be re-aligned towards the north so as to allow for the preservation of the banking up to the old Schoolhouse site (allowing for soil anchoring), then regraded with a concrete retaining structure at the base, as per section C (on this drawing). We would also recommend that the two California Pine trees adjacent to the bridge and the veteran European Beech tree adjacent to Porterstown Road (on the old School House site) be retained.



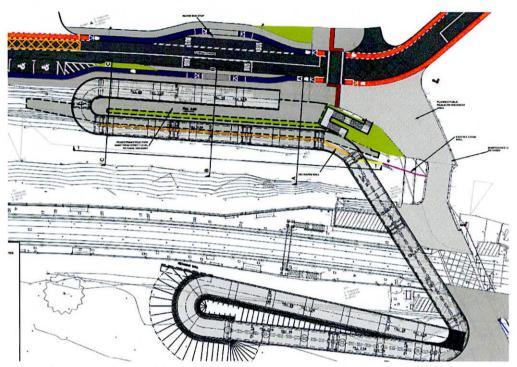
Excerpt from General Arrangement Drawing-Sheet 2 of 3

The design and construction detailing of this bridge should also be reconsidered, as per our comments on Coolmine-Option 9, so as to minimise its impact on both the rural character visual amenity and ecology of the deep sinking section of the Royal Canal. Therefore we recommend that the *COR-TEN®* clad lightweight steel structure proposed for Ashtown and Coolmine be selected as an alternative to a visually massive prefabricated concrete system build which has been selected.

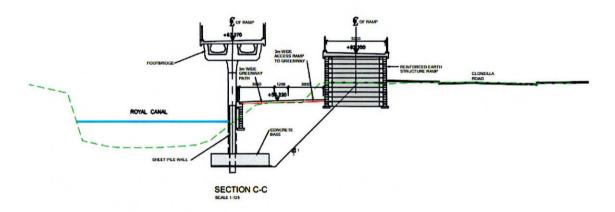
Clonsilla-

Option 1-Pedestrian, Cycle & Mobility Impaired Bridge General Arrangement - Sheet 1 of 3

From this excerpt from *Clonsilla-Option 1-Pedestrian, Cycle & Mobility Impaired Bridge General Arrangement - Sheet 1 of 3,* it is indicated that this will involve the clear felling of all existing mature trees and hedgerow along the northern bank of the Royal Canal and that the rich ecology of the hedgerow down to the towpath will be lost.



Excerpt from GAs -sheet 1 of 2



Excerpt from Plans, Elevations and Sections - Sheet 2 of 3

From the above section and plan one can imagine that the visual impact of the 6m wide bridge ramp in this location which retains a rural and wooded character would be significant, as would the 4 to 6m high massive concrete stanchions that will be cut into the Royal Canal bank, which would have visual impact on the character of the place as well as the canal's rich fauna and flora.

We therefore recommend that the construction detailing of this bridge should also be reconsidered to avoid vertical supports cutting into the Royal Canal (which is a Natural Heritage Area) and its adjacent tow path.

It is accordingly recommended that the lightweight steel structure proposed for Ashtown and Coolmine be selected as an alternative to a visually massive prefabricated concrete system build which has been selected in the railway.

We also recommend that the COR-TEN® clad lightweight steel structure proposed for Ashtown and Coolmine be selected as an alternative to the proposed visually massive prefabricated concrete system build due to the sensitivity of this location.

Finally, in order to comply with the ethos of universal design and the fact that Irish Rail are currently installing lifts around the country as part of the 'Big Lift' we recommend accessible lifts be provided.

Ashtown -Level Crossing closure

The desirability of eliminating level crossings is fully supported.

The proposed Ashtown tunnel is disproportionate in terms of the advantages of carrying out such a massive civil engineering project in a lightly trafficked suburb of Dublin. We note that Ashtown already has good vehicular access to the city centre via the recently constructed overbridge via Cabra and the Navan Road, via the River Road to the N3 and M50 and via the Ballybogen Road to the North Road and the M50. It is also served well in terms of public transport with train stations at Ashtown and the new train station at Pelletstown. Ashtown also adjoins also adjoins the soon to be upgraded Royal Canal Urban Greenway, which will provide high quality and safe pedestrian and cycling infrastructure.

The same considerations apply to provision for user friendly and accessible pedestrian and cycling bridge crossing access at Ashtown as we have recommended for other locations.

As the basis of the Dart Plus programme is the provision of fast and frequent sustainable public transport for the future (and to encourage residents out of their cars), the proposed Ashtown Tunnel has not been justified.

Please acknowledge our submission and advise us of any decision made.

Yours sincerely,

Ian Lumley Head of Advocacy An Taisce – The National Trust for Ireland