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Your Ref: ABP- 314232-22

An Bord Pleanála,
64 Marlborough Street,
Dublin.

28th October 2022

Dear Sir/ Madam,

Re: Railway Order Application– Regarding the proposed DART+ West Railway Order - Dublin City to Maynooth and M3 Parkway

Irish Water (IW) has reviewed the plans and particulars listed online for the subject Railway Order Application, and based on the information published online (www.dartplus.ie), with specific regard to the Planning Report, Chapter 10 (Water) & 11 (Hydrology) of the Environmental Impact Assessment Report (EIAR) and the planning application Drawings and Maps, IW have the following comments:

At the offset, we would like to confirm, as set out in Chapter 10.3.2.3. of the applicant's EIAR, the applicant (Irish Rail) has engaged with IW regarding the subject proposal, to assess a no. of points on the proposed route. The focus of this engagement was to consider the items detailed below.

Please note, while the known diversions required to facilitate the proposed development are listed below at length, this list is based on the best information available to IW and the applicant at this time. It should not be considered an exhaustive list of all diversions that may be required. Therefore, any additional diversions that may be required, in excess of those listed below, should be agreed with IW at the earliest possible stage, e.g. prior to the commencement of development.

a) Track Lowering Operations

IW can confirm that pre-application consultation was undertaken with the applicant regarding the following locations, where it is proposed to lower the existing track, as IW owned assets were identified in close proximity to proposed works.

#	Reference	Section of existing pipe under track lowering			Irish Grid coordinates
		Diameter (mm)	Material	Length under tracks (m)	
1	OBCN290 (Water)	100	PVC	8	302128, 241754
2		200	PVC	8	302128, 241754
3	OBCN290 (Gravity Foul)	450	CO	22	302134, 241706
4	OBD221-222 (Water)	50.88	CI	17	315016, 236317
5	OBD223 (Water)	101.6	DI	11	315903, 235996
6	OBD226 (Gravity Foul)	550	CI	13	316932, 235476
7		900	CI	16	317008, 235400
8	OBG21 (Gravity Foul)	225	Concrete	18	293390, 237125
9		450	Concrete	18	293422, 237131
10	OBO36 (Gravity Foul)	375	CI	64	317303, 235110
11		1200	Brick	75	317301, 235096
12	OBO36 (Pumped Line)	400	CI	66	317303, 235110
13	OBG18	600	DI	14	296241, 237336
14		600	DI	14	296241, 237336

Table 1: IW assets at locations where rail track lowering proposed

Conclusion: Based on the details provided by the applicant, IW confirm that subject to detailed design being agreed with IW for the above locations and valid agreements being put in place prior to the commencement of development, the subject development can be facilitated.

b) Diversions at Rail Bridge Locations;

Discussions were also held with the applicant regarding the following locations, where railway bridge modifications were proposed, that are considered may potentially impact on IW owned assets in close proximity.

#	Reference	Section of existing pipe to be decommissioned			Section of new pipe			Irish Grid coordinates
		Diameter (mm)	Material	Length to be decommissioned (m)	Diameter (mm)	Material	Length of new pipe (m)	
1	OBG5 - Broombridge Rd	152.	CI	28	200	DI	28	313186, 237191
2	OBG9 - Old Navan Rd	304.8	AC	23	350	DI	25	308795, 238109
3	OBG11 - Castleknock Rd	228.6	CI	32	250	DI	35	308487, 238044
4	OBG16 – Louisa Bridge	350	DI	34	350	DI	44	299387, 236517
5		450	AC	23	450	DI	36	
6	OBD228 - Sheriff Street Bridge	125	HPPE	63	125	DI	63	317415, 234774

Table 2: Locations where rail bridge modifications proposed and resulting diversions of IW assets proposed;

Conclusion: Based on the details provided by the applicant, IW confirm that subject to detailed design being agreed with IW for the above locations and valid agreements being put in place prior to the commencement of development, the subject proposals can be facilitated.

c) Other Diversions Required

Discussions were also held with the applicant regarding additional locations, where it was considered the proposed development may impact existing IW infrastructure, and a diversion may be required;

#	Reference	Section of existing pipe to be decommissioned			Section of new pipe			Irish Grid coordinates
		Diameter (mm)	Material	Length to be decommissioned (m)	Diameter (mm)	Material	Length of new pipe (m)	
1	Spencer Dock Station Watermain South	300	TBC	79	300	DI	71	317428, 234612
2	Spencer Dock Station Gravity Foul South (Duplication)	450	Concrete	75	450	Concrete	75	317428, 234612
3	Spencer Dock Station Gravity Foul East	1000	Brick	47	1000	Concrete	47	317428, 234612
4	Spencer Dock Station Gravity Foul East	525	Concrete	41	525	Concrete	41	317428, 234612
5	Ashtown Level Crossing – south side	80	uPVC	217	90	PE100 SDR11	258	311017, 237200
6	Ashtown Level Crossing – north side	100	uPVC	180	125	PE100 SDR11	175	310993, 237429
7	Ashtown Level Crossing – north side	150	MOPVC	100	180	PE100 SDR11	111	310942, 737471
8	Ashtown Level Crossing	1350	Concrete	153	1350	Concrete	165	311033, 237186

#	Reference	Section of existing pipe to be decommissioned			Section of new pipe			Irish Grid coordinates
		Diameter (mm)	Material	Length to be decommissioned (m)	Diameter (mm)	Material	Length of new pipe (m)	
	- south side							
9	Ashtown Level Crossing south side	225	uPVC	61	225	uPVC	46	310862, 237306
10	Coolmine – Diswellstown Road Junction – Diversion No.1	200	MOPVC	121	200	PE100	121	306141, 237388
11	Coolmine – Diswellstown Road Junction – Diversion No.2	200	uPVC	45	200	PE100	36	306216, 237345
12	Coolmine – Diswellstown Road Junction – Diversion No.3	200	uPVC	90	200	PE100	91	306217, 237309
13	Coolmine – Clonsilla Road Junction – Diversion No.4	101.6	uPVC	105	110	PE100	140	306324, 237961

#	Reference	Section of existing pipe to be decommissioned			Section of new pipe			Irish Grid coordinates
		Diameter (mm)	Material	Length to be decommissioned (m)	Diameter (mm)	Material	Length of new pipe (m)	
14	Barberstown Level Crossing - Diversions No. 1	100	uPVC	96	125	PE100	91	303961, 237904
15	Barberstown Level Crossing - Diversions No. 2	100	uPVC	152	125	PE100	154	303961, 237904
16	L5041	152	AC	783	160	PE	827	290589, 238312
17	Dunboyne Substation	450	Concrete	35	450	Concrete	64	302115, 241892

Table 3: Locations where rail bridge modifications proposed and resulting diversions of IW assets proposed

Conclusion: Based on the details provided by the applicant, IW confirm that subject to detailed design being agreed with IW for the above locations, a Diversion Agreement between IW and the applicant being executed in advance of any works, and other valid agreements including Easements for private lands being put in place, the proposals can be facilitated

d) Diversions at Ashtown Substation

Based on available records, it is considered that the Ashtown Substation 450mm gravity foul sewer is abandoned and no longer in use.

#	Reference	Diameter (mm)	Material	Irish Grid coordinates
18	Ashtown Substation	450	Concrete	311118, 237404

Table 4: Location of potentially Abandoned Sewer

Conclusion: Confirmation is required to confirm if this sewer is still in use. This must be verified by the applicant using CCTV during detailed design phase, and in the scenario the sewer is still live then an appropriate detailed design for a diversion must be agreed with IW, a Diversion Agreement between IW and the applicant must be executed in advance of any works, and other valid agreements including Easements for private lands being put in place.

e) New Connections

As part of the subject development, the applicant has made two Pre-Connection Enquiries to IW relating to future new connections at Docklands Rail Station and new Maynooth Rail Depot. IW have provided Confirmation of Feasibility letters to the applicant for both;

- **CDS22002944**: Connection of 1 no. business premises at Upper Sheriff Street, Docklands, Dublin 1. It is noted that this connection can be facilitated without infrastructure upgrades by IW.

- **CDS21000830**: Connection of 1 no. business premises at Maws, Municipal District of Clane, Maynooth, Co. Kildare. It is noted that the proposed development can be facilitated, subject to upgrades, namely;

    - **Water:** Approximately 1300m of network upgrade and associated works will be required;
    - **Wastewater:** Approximately 500m of network extension and associated works will be required to connect the site development with Rye Abby Pumping Station.

f) Access requirements to IW's Spencer Dock Waste Water Pumping Station

IW's Spencer Dock Waste Water Pumping Station (located at Irish Grid coordinates 317540, 234680) and the roadway to the west (unnamed) that IW and IW agents use for access is outlined to be part of the temporary land acquisition in IR's Railway Order application.

IW and IW agents require 24/7 access here as it also forms part of the joint fire safety plan that IW have with the building owner. It is further required for emergency vehicle access in the event of an issue while maintaining the confined space.

Furthermore the generator for the site is located underground. It cannot be lifted to the surface without a crane. In the unlikely event this needs to be removed at

the same time as IR's temporary land acquisition, a crane will need to be set up by IW on the road at the entrance. IW have reinforced the road in this vicinity with steel to make it fit for this purpose for supporting a crane.

As part of our pre-application consultation, IR have provided a commitment to IW that the access to the IW's Spencer Dock Waste Water Pumping Station will be maintained during the temporary land acquisition period associated with construction of the adjacent new Spencer Dock Rail Station. IR have further outlined that in the unlikely event that any road closures are required in the vicinity during the construction period, these will be agreed with DCC / IW and residents in advance of undertaking the works, with provision made for emergency access.

IW therefore request, should An Bord Pleanála Grant permission for the subject Railway Order, a condition is placed on the permission requiring access to IW's Spencer Dock Waste Water Pumping Station, and the roadway to the west, is maintained for IW employees and contractors during the construction and operational phases of the proposed development.

Furthermore, IW request a further condition is included on the permission to state that in the event the road suffers any damage during as a result of the development, the road will be reinstated to the satisfaction of IW upon completion of development.

g) Groundwater Source Protection

In addition to the above, the proposed development has also been assessed for any likely impacts to Groundwater Sources in close proximity to the development site. IW have reviewed the planning application site and proposed route and can confirm it passes in close proximity to the Dunboyne and Leixlip Abstraction Points, see Figure 1 below.

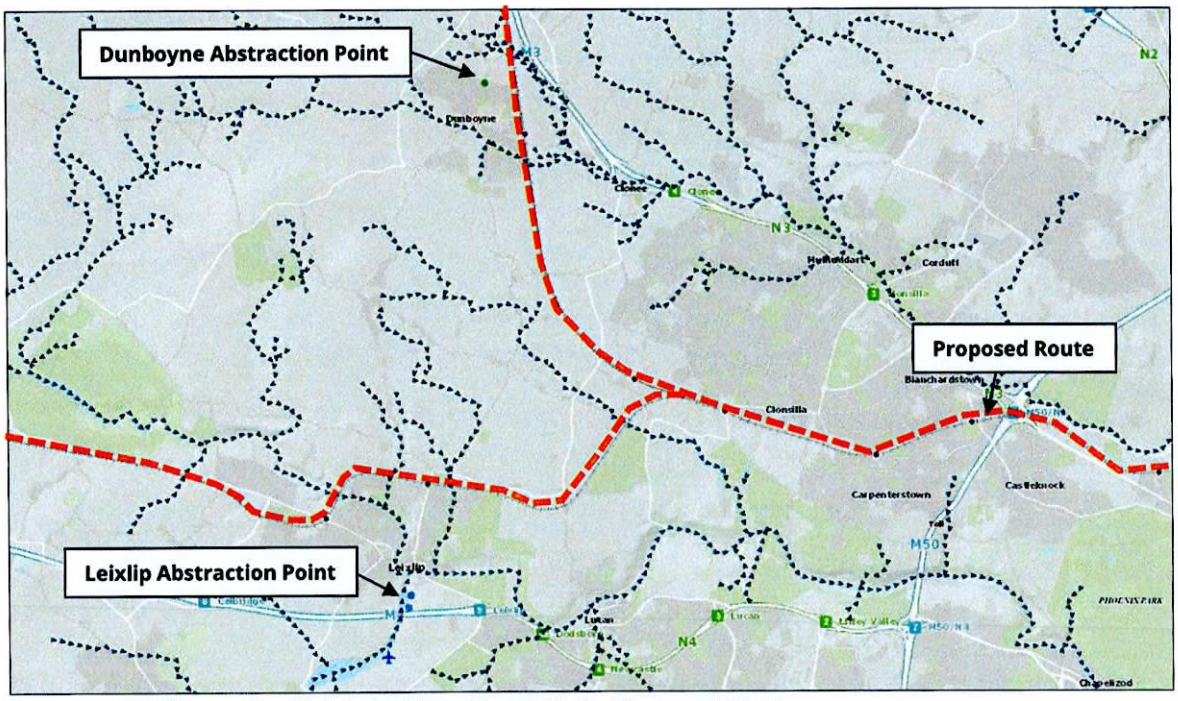

Figure 1: IW Abstraction Points in Close Proximity to Proposed Route

- Leixlip Abstraction Point

On assessment, it is considered that, due to the developments location downstream from the Leixlip Abstraction Point, the proposed development is not likely to have a negative impact on the Leixlip Abstraction Point.

- Dunboyne Abstraction Point

In addition, the proposed route is located in close proximity to the Dunboyne Abstraction Point, specifically relating to the area of development immediately south of the M3 Parkway Station where works are proposed. A detailed assessment of the likely impacts of both the construction and operational phases of development, are set out in Chapter 11.5 of the applicant's EIAR.

IW acknowledges the mitigations proposed as part to the applicants EIAR, however, irrespective of the mitigations outlined in the applicant's EIAR, no deterioration of or impact to, these drinking water sources and/or abstractions shall occur at any stage of the project, ither construction or operational. The applicant will be required to engage with IW to agreed all mitigation measures to protect these drinking water sources and/or abstractions prior to any works or operations commencing.

IW are satisfied that, the proposed development can be facilitated without negative impacts to the Dunboyne Abstraction Point, subject to the following;

- The develop/operator must comply with the Water Framework Directive and River Basin Management Plan objectives to ensure that the development will not negatively impact on the water quality of source/receiving waters during both construction and operational phases

- The developer/operator must meet the requirements of EIA Directive 2014/52/EU

- The developer/operator must comply with the requirements of the Groundwater Directive, Article 6(1) of Directive 2000/60/EC

In summary, Irish Water respectfully requests the board condition(s) any grant as follows:

1. The applicant shall sign a Connection Agreement with Irish Water, prior to any works commencing for new connections to the Irish Water network.

2. The applicant shall sign a Diversion Agreement with Irish Water, prior to any works commencing for diversions of the Irish Water network (note Table 3 above).

3. Any proposals by the applicant to build over or divert existing water or wastewater services shall be submitted to Irish Water, for written approval, prior to the commencement of development.

4. Separation distances between the existing Irish Water assets and proposed structures, other services, trees, etc. have to be in accordance with the Irish Water Codes of Practice and Standard Details.

5. The development shall not impact any IW Drinking Water Source and/or abstraction point.

6. The development shall not impact any IW Drinking Water Source and/or waters used for the abstraction of drinking water nor cause any deterioration in quality during the construction and operational phase of the proposed development. The applicant shall engage with IW to agreed all mitigation measures to protect these drinking water sources and/or abstractions prior to the commencement of Development.

7. The applicant shall ensure access to IW's Spencer Dock Waste Water Pumping Station, and the roadway to the west, is maintained for IW employees and contractors during the construction and operational phases of the development.

8. The applicant shall ensure the access road to IW's Spencer Dock Waste Water Pumping Station, containing essential IW infrastructure, does not suffer any damage as a result of the development. In the event the road suffers damage (including its steel reinforcements) it will be reinstated, to the satisfaction of IW, upon completion of development works.

9. All development shall be carried out in compliance with Irish Water Standards codes and practices.

Queries relating to the observations above should be sent to planning@water.ie

PP. Ali Robinson

Yvonne Harris
Connections and Developer Services