



28<sup>th</sup> October 2022

The Secretary,  
An Bord Pleanála (Strategic Infrastructure Division)  
64 Marlborough Street,  
Dublin 1,  
D01 V902

By email to: [sids@pleanala.ie](mailto:sids@pleanala.ie)

**Re: ABP-314232-22 DART+ West Electrified Railway Order 2022**

Dear Secretary,

We refer to the application for a railway order under Section 37 of the Transport (Railway Infrastructure) Act, 2001, as amended in respect of the above proposed development being made for Dart+ West.

Fingal County Council welcomes the application for the Railway Order for DART+ West. DART+ is a transformative railway investment programme which will modernise and improve existing rail services in the Greater Dublin Area, with DART+ West providing the opportunity to electrify the DART network extending from Connolly/Spencer Dock to Maynooth and to the M3 Parkway with significant enhancements in capacity and service frequency. Fingal County Council acknowledges the significant contribution that DART+ will make towards supporting compact urban growth, promoting modal shift, reducing congestion and emissions in the Dublin region, the wider Dublin area, and the Eastern region.

To facilitate the project, interventions are required to remove constraints along the route including the permanent closure of several existing level crossings and the construction of new infrastructure, including railway crossings. Whilst Fingal County Council is supportive, at the strategic project level, of this infrastructure, we welcome continued engagement with Irish Rail to ensure an optimal design solution for the interventions that will impact on the communities that are located along the rail corridors in Fingal as well as a high-quality long-term solution for Fingal, the wider Dublin area and for the Dublin and Eastern region.

**POLICY CONTEXT**

*Project Ireland 2040* identifies the need for reliable, affordable, sustainable, and integrated public transport in Dublin and in this regard promotes the delivery of key infrastructure projects as set out in the *Transport Strategy for the Greater Dublin Area 2016-2035*. A cornerstone project of the strategy includes the DART expansion programme, including the electrification of the Maynooth to city centre railway line and the replacement of existing level crossings.

The *Regional Spatial and Economic Strategy [RSES] for the Eastern and Midland Region 2019-2031* promotes the growth of Dublin and regional centres in a sustainable manner, aligning services with population and economic growth, optimisation of infrastructure including public transport and the

promotion of compact urban settlement patterns. RSES promotes the DART expansion programme and the proposed electrification of the rail line to Maynooth, which represents a significant opportunity for sustainable transport orientated development both along the transport corridor and with respect to longer term strategic landbanks such as Dunsink within the administrative area of Fingal County Council.

The *Fingal Development Plan 2017-2023* (FDP 2017-2023) through its strategic aims seeks to, ‘*promote an appropriate balance of development across the County, by developing a hierarchy of high quality, vibrant urban centres, and clearly delineated areas of growth, and favouring expansion in areas nearest to existing planned public transport nodes*’. Key strategic policy within the FDP 2017-2023 seeks the development of a high quality integrated public transport system across the county with emphasis on transport linkages to Dublin City including support for the DART expansion programme. Chapter 7 of the FDP 2017-2023, Movement and Infrastructure, is explicit in the promotion of integrated land-use and transportation. DART+ West will provide a high-capacity service along the Maynooth/M3 Parkway corridor to Dublin city centre, serving existing and new communities within Fingal including developing employment and residential areas. Specifically, the route will serve extensive areas of residential zoned lands to the south-west of Blanchardstown Town Centre, including Hansfield Strategic Development Zone (SDZ) and the Barnhill and Kellystown Local Area Plan (LAP) lands. These residential land-banks benefit from proximity to the rail corridor and are served by Hansfield, Clonsilla and Coolmine stations. These lands are also accessible to high quality employment opportunities within the Dublin Enterprise Zone.

In this regard, DART+ West fulfils key aims of the FDP 2017-2023 for sustainable growth, connecting existing, new communities and employment areas along the route with the city centre and the wider region as well as providing transport mobility and transport network integration for residents, commuters, and visitors. In addition, this strategic infrastructure will provide a fast and efficient sustainable transport alternative to the private car which is vital in promoting modal shift away from non-sustainable travel modes and enabling a reduction in our transport related carbon emissions in line with FDP 2017-2023 and wider public policy.

The process for adoption of the Fingal Development Plan 2023 – 2029 is currently ongoing. This reiterates and emphasises the requirement for land-use and transport planning to be closely aligned. Integrating new housing, employment and services with high-capacity public transport corridors in conjunction with attractive walking and cycling networks and permeable links to rail and bus stations can reduce the need to travel and support the functioning of a connected and sustainable transport system. This also has the benefit of extending the catchment of sustainable modes to more people and places to support investment in public transport infrastructure. This will enable the implementation of so-called “transit-oriented development” whereby development is consolidated around existing or planned public transport at a scale or density that supports the viability of high-capacity public transport infrastructure. Adopting this approach facilitates compact growth, a recurring theme in this Plan and maximises the opportunities presented by the DART+ proposal. Land-use policy within Fingal supports development along its identified high-capacity public transport corridors.

### **Long-Term Strategic Landbank at Dunsink**

The strategic location and development potential of undeveloped lands at Dunsink is acknowledged within the RSES, the FDP 2017-2023 and the draft Fingal Development Plan 2023 – 2029. This area provides a unique opportunity to deliver new homes in a sustainable manner within the existing built-up footprint of Dublin. The lands are directly served by high quality public transport via the extensive bus services along the Navan Road, the Ashtown and Navan Road Parkway train stations and Luas Broombridge and the proposed Luas Finglas to the east. In line with national, regional, and local policy

objectives and subject to the necessary appraisals, DART+ West offers the potential to support sustainable transport orientated development of this long-term strategic landbank.

The designation of these lands as a Strategic Long-Term Reserve in the draft Fingal Development Plan is key to the long-term strategic planning for the future delivery of new housing, physical and social infrastructure for Fingal and for Dublin as a whole, as set out in regional and national planning policy over the coming decade.

The Strategic Long-Term Reserve lands at Dunsink provide a unique opportunity to significantly consolidate the Dublin Gateway in a sustainable manner underpinned by high quality public transport. The closed landfill offers an opportunity for a regional park and will be a key part of the amenity facilities of any future urban neighbourhood. Fingal County Council's long-term commitment to the development of these lands was demonstrated by the publication in 2022 of a Feasibility Study to inform the future sustainable development of the lands at Dunsink.

As it is likely therefore that the regeneration of these lands will take place over a longer time frame, FCC's vision for these lands is the *"Development of a low-carbon mixed-use transit-orientated urban quarter which prioritises active travel and public transport modes both within and outside, is well connected to the wider City via high quality public transport and active travel infrastructure and seeks to protect and enhance the environmental and historic character of the area."*

Future transit-oriented development at Dunsink in combination with similar development within the administrative area of Dublin City Council along the rail line, including the re-imagining of derelict industrial and other under-utilised lands, has the potential to positively enhance, consolidate and transform Dublin north-west, specifically within the M50 corridor thereby aligning with national and regional planning policy on brownfield redevelopment, compact growth and intensification in proximity to major public transport infrastructure.

### **PROPOSED CLOSURE AND REPLACEMENT OF LEVEL CROSSINGS**

To facilitate the electrification and enhanced service delivery along the railway line, several level crossings are proposed for permanent closure and replacement with alternative design solutions. These include existing level crossings within Fingal at Barberstown, Clonsilla, Porterstown, Coolmine and Ashtown. It is acknowledged within the FDP 2017-2023 that a careful balance is required regarding the implementation of the DART+ West programme, particularly in the context of mitigating environmental impacts of the scheme. Specifically, Objective MT31 of FDP 2017-2023 seeks to

*'Design and implement measures, having regard to potential environmental impacts, to mitigate the increased congestion on the local road network caused by more frequent closures of the existing level crossings on the Maynooth Line. Ensure that well in advance of any such measures being taken, extensive direct consultation is undertaken with local communities and residents who would be directly impacted by any such measures.'*

The DART+ West *Preliminary Options Selection Report* notes that the proposed closure of these level crossings will improve train frequencies and efficiencies on the route as well as improve public safety and remove current traffic constraints within these areas. Proposed design solutions for the relevant level crossings within Fingal include:

- i. The closure of the Ashtown level crossing, the construction of a road underpass as a replacement vehicular route and new pedestrian and cycle bridge at the station.
- ii. The proposed replacement of the Coolmine level crossing with a new pedestrian and cycle overbridge adjacent to the existing crossing.

- iii. The closure of the Porterstown level crossing and the provision of a new pedestrian and cycle bridge, with the current vehicular movements removed at this location and diverted onto the adjacent road network including the Dr. Troy Bridge.
- iv. The closure of the Clonsilla level crossing and the provision of a new pedestrian and cyclist bridge.
- v. The closure of the Barberstown level crossing and the provision of a new bridge to cater for all modes.
- vi. Works to increase the vehicular capacity of a number of junctions to accommodate the projected increases in diverted traffic arising from the closure level crossings in Dublin 15 and the resulting diversion of traffic.

While the benefits to the DART+ programme of permanently closing and replacing level crossings at these locations are acknowledged, it is noted that the FDP 2017-2023 includes Local Objectives 137 and 142 which seek the preservation of the existing pedestrian and vehicular rights of way at the Porterstown and Coolmine level crossings. Local Objective 141 also seeks to prohibit any road bridge at Porterstown. In this regard, the Preferred Option proposes the replacement of the Coolmine level crossing with a new pedestrian and cycle overbridge adjacent the existing crossing and a new pedestrian and cycle bridge at Porterstown. In the context of the provisions of Objective MT31 and Local Objectives 137 and 142, Irish Rail should continue to liaise with relevant stakeholders and communities towards the optimum design solutions whilst meeting FDP objectives.

Fingal County Council is supportive of the provision of pedestrian and cycle links at the location of the level crossing closures and this is in keeping with the *Greater Dublin Cycle Network Plan (2013)*, *NTA Transport Strategy for the Greater Dublin Area* and the *Fingal Development Plan 2017-2023*. The Council notes that the removal of a vehicular road crossing over the railway at Coolmine station, with no associated provision of a replacement vehicular crossing at this crossing, is likely to have a detrimental impact on general traffic and consequently, in the absence of bus priority measures, bus service operations in the wider Dublin 15 area. This is particularly the case given the already limited number of canal and railway crossings in the Dublin 15 area. If high volumes of traffic are to be re-routed, there is potential for junctions and other crossing points along the various diversion routes to experience increased delays for pedestrians and cyclists, significant traffic congestion for vehicular modes including public transport, and associated severance, air quality and road safety issues. The inclusion of robust bus priority measures at all junction redesigns is therefore considered necessary as part of the Dart+ project.

Fingal County Council is working to deliver a stronger active travel network in the area, and the National Transport Authority has responsibility for the licencing of public bus services. As such, it is important that Irish Rail works with the National Transport Authority and local stakeholders to set out a clear vision for how bus services will efficiently operate in this new road network configuration and, in particular, how bus services will be insulated from the likely traffic congestion. The Council notes that there is no bus priority measures indicated on the scheme drawings at present and, whilst this may be due to the bus licencing and routing issues being outside the applicant's remit as noted above, the Council would nevertheless welcome more detailed, multi-stakeholder discussions on the inclusion of specific bus priority measures at all junctions.

#### **Amended Junction at Diswellstown Road/ Porterstown Link Road**

The provision of a junction with protected cycle facilities is supported by Fingal County Council. The layout of this junction should be compatible with the Kellystown Road project, currently at preliminary design stage with the Planning & Strategic Infrastructure Department of Fingal County Council. The impact on the adjacent school while works are being carried out on the junction will require detailed

consideration in terms of construction management. The Council would emphasise the need for appropriate levels of pedestrian crossings times at this junction, which may be difficult to achieve given the scale of the lane arrangements with some arms having five traffic lanes. A review of this arrangement should be undertaken and the Council is happy to engage on this matter at a more detailed level. The inclusion of a right turn filter lane into Porterstown Lane is considered excessive and a reduced width crossing or a refuge island for pedestrians could be a more appropriate use of road space here.

#### **Amended Junction at Clonsilla Road/ Diswellstown Road/ Blanchardstown Road South**

The provision of a signalised junction at Clonsilla Road/ Blanchardstown Road allows for co-ordinated management of traffic in this area. The provision of improved cycle protected facilities and pedestrian crossings is supported by Fingal County Council. The design for traffic signals could consider integration with the nearby junction of St Mochta's Road/ Coolmine Industrial Estate. In any event, this and all other road and cycling infrastructure should be designed in line with relevant road design standards and guidelines including the National Cycle Manual. As the roads authority, Fingal County Council will ultimately take these redesigned roads in charge and as such, input from the Council is considered essential at this planning stage.

#### **Amended junction at Castleknock Rd/ Park Lodge**

An opportunity exists to incorporate and future-proof the provision of higher quality cycle and pedestrian facilities at Castleknock Bridge as part of an overall holistic design for this area, in conjunction with the railway bridge modifications proposed as part of DART+. It has been a long-standing objective of Fingal County Council and the National Transport Authority to progress the Blanchardstown to Phoenix Park Cycle Route at this location. Discussions were had with the Dart+ West project team in this regard, however it was stated by the Irish Rail team that this was outside the scope of the Dart+ project. If modifications are being undertaken to the bridge here, the new infrastructure should be future-proofed to facilitate the future Blanchardstown-Phoenix Park cycle route.

#### **Royal Canal Urban Greenway**

The Royal Canal Urban Greenway is currently being brought through the design process by Fingal County Council in collaboration with the National Transport Authority and Waterways Ireland. Whilst this proposed greenway project and DART+ will complement each other in terms of connectivity and transport integration, there is a need for the continuation of the ongoing constructive liaison that has taken place between the various projects.

#### **Kellystown Road**

Fingal County Council is currently in the early stages of designing Kellystown Road which will form an important upgrade to the local road network in the Dublin 15 area and will serve existing road users as well as the Kellystown and Barnhill LAP lands. The DART+ proposals for a bridge replacement of the Barberstown level crossing will allow for linkage between the upgraded road network, adjacent development lands and the greenway. This aspect of the scheme will require continued consideration between the two project teams.

#### **Kellystown Local Area Plan**

The Kellystown Local Area Plan (LAP), relating to lands immediately to the south of the Dublin-West line, was adopted in January 2021. The LAP envisages three "Development Areas" with the phasing of development to progress generally in an east-to-west manner from Porterstown Road in the east of the LAP towards the R121 in the west.

The Eastern Development Area is subject to Key Objective DA 1.9 *'The Eastern Development Area should incorporate all new railway infrastructure resulting from amendments to the level crossing.*

The Western Development Area is required to accommodate any amendments made to the existing level crossing and operation of replacement and is required under Key Objective DA3.2 *to ensure a high level of pedestrian and cyclist connectivity through the lands to connect Clonsilla Railway station to the surrounding area.*

## **Ashtown**

### *Active Travel and Transportation*

We welcome the provision of the pedestrian and cycling bridge at Ashtown station, which addresses several concerns relating to accessibility, safety, and convenience. The amended scheme acknowledges the fact that this is a strong desire line and access is required for all modes, at all times and this represents a significant improvement for people walking, cycling, and using public transport compared to the previous proposal. We understand that the underpass can still be used by people walking and cycling if they choose to avoid the new overbridge.

Ashtown Road forms the boundary of Fingal County Council and Dublin City Council administrative areas. Fingal County Council and Dublin City Council have engaged with stakeholders, including the National Transport Authority and Fáilte Ireland, regarding the benefits of creating a high quality, safe and comfortable walking and cycling link along this alignment to connect the lands at Dunsink including Dunsink Observatory, the Tolka Valley, the Royal Canal, the large population centre around at Rathborne Village, Ashtown train station and the Phoenix Park. This objective could be facilitated by DART+ through the creation of a dedicated active travel link on the Ashtown Road from its junction with Martin Savage Park to the Ashtown level crossing. In this revised option, the DART+ proposal still includes extensive civil engineering works, including road widening, a new roundabout turning area and the creation of drop-off and disabled parking, on the southern side of Ashtown Station. Fingal County Council is concerned that the inclusion of road widening, and car parking/set-down facilities will give rise to significant use by general vehicular modes, to the detriment of sustainable modes wishing to share this corridor. The current proposal prevents the creation of such a dedicated active travel link, or at best significantly reduces the level of service for users in any such future facility. The removal of a large stretch of mature trees and hedgerow along the roadside is also included to facilitate private car users; given Ashtown Road is already currently used by two-way traffic this seems excessive. Whilst we acknowledge the rationale for providing car access for people who are mobility impaired, there is already direct access for vehicles to the front door of the station to Ashtown Station from the north. Given the lack of through traffic that will use the widened Ashtown Road in the future scenario to access the new set-down area, the proposed indented area for parking/set-down seems excessive, and this could be rationalised in favour of in-line on-road parking with a give-way/stop-go traffic arrangement as is commonly in use throughout residential and other low-traffic roads in Fingal and Dublin City. This would remove the need for road widening and the associated negative impacts, which seems excessive, unwarranted and focused on meeting the needs of private vehicle users only.

### **Cycle Parking**

FCC welcome the proposal to include cycle parking at Ashtown and Coolmine train station however the lack of bike parking at the other stations along the route is not considered acceptable. As high-capacity transport interchanges, which will in turn facilitate high-density development in proximity, it is certain that train stations along the route will experience high volumes of use by cyclists and pedestrians. In order to maximise the catchment of each of the stations, the provision of high quality, convenient and secure cycle parking at all stations is an essential element. The inclusion of bike parking is a key mitigation measure in alleviating the potential impacts of increased traffic volumes on the

approach roads to the stations and as such, is comparable to the inclusion of other mitigation measures already included within DART+, such as road junction upgrades which have been included in the application. Fingal County Council is happy to engage with the scheme promoters to identify suitable bike parking locations to be developed as part of Dart+ for all stations.

### **Construction Phase**

Fingal County Council has concerns that the programme of construction of some of the works needs to be carried out in a manner which limits the impact on the environment. While the reports on mitigation have indicated some of the issues FCC have concerns for the following;

- The programme details that Castleknock Road will be closed for a period of 15 weeks and reduced to shuttle traffic flow for 19 weeks to reconstruct the bridge over the railway. This closure will have to be minimised and carried out at a time of year with reduced traffic flow. While this closure is in place other works on diversion routes which would affect traffic flow should be minimised.
- The National Transport Authority has a current planning application with ABP for improvements to the Blanchardstown bus corridor. The careful coordination of works in the area should be agreed in advance with FCC and the NTA to avoid any major traffic conflict.

## **NATURAL AND BUILT ENVIRONMENT, ARCHITECTURAL HERITAGE**

### ***General observations***

The protection, maintenance, and enhancement of the natural and built heritage of the county is part of the strategic policy of the FDP 2017-2023 to deliver the main aims of the development plan. The DART+ project in places will directly impact the Royal Canal, which is a Protected Structure, a proposed Natural Heritage Area and a Landscape Character Type of High Landscape Value and High Landscape Sensitivity. The habitats of rare and threatened species are located within and along the Royal Canal corridor, including species protected by law (FDP Objectives NH16, NH17). The route also borders areas of zoned open space at Castleknock, Coolmine and Clonsilla. This also includes zoned high amenity lands of Beechpark Demesne at Clonsilla and zoned green belt lands to the south of the Barnhill LAP lands. The key provisions of relevant zoning objectives and associated zoning vision for these areas is principally the protection and enhancement of these areas.

The FDP 2017-2023, and the Draft FDP, has specific objectives relating to development and the Royal Canal, protected structures, historic building stock, historic bridges, historic designed landscapes, and character landscapes of high value & significance (see Objectives CLONSILLA 3, ED69, CH25, CH33, CH37, CH43, Ch44, Ch46, NH34, NH36). Development needs to be carefully designed and sensitive to both the setting of the place and to the existing historic structures and landscapes. There are several protected structures along and adjoining the route including the Royal Canal itself. These are listed in the Record of Protected Structures as set out in Appendix 2 of the FDP 2017-2023. There are also historic buildings and structures within or adjoining the boundaries of the project that do not have statutory designations, such as historic houses and rail bridges, but these have value as part of the surviving historic building stock of the county, giving character to a place. There are archaeological monument and sites, that are protected by National Monument legislation, which are set out in the list of Recorded Monuments in Appendix 3 of the Plan. A careful balance is required between the need to preserve and enhance the natural and cultural heritage features along the route and the provision of strategic infrastructure. The project should be designed, where achievable, to avoid directly impacting on the natural, architectural, archaeological, and designed landscape heritage and have regard to the relevant protection and enhancement provisions as set out in Chapters 8 Green Infrastructure, Chapter 9 Natural Heritage and Chapter 10 Cultural Heritage of the FDP 2017-2023.

High quality design and sensitive interfacing of proposed works is a critical requirement regarding the provision of any new rail over-bridge structures, underpasses where they impact on statutory designated natural and built heritage sites, open space, high amenity and green belt lands and associated heritage features. This is also relevant where the proposed scheme interfaces with existing and new residential and employment areas along the route and the need to protect the amenity of these areas. The design response cannot be solely based on regulatory and engineering requirements but must respect and enhance the surrounding environment. The location of construction compounds must avoid directly and indirectly detrimentally impacting on the protected architectural and natural heritage along the route.

- The previous submission by Fingal County Council requested that the options and their impacts on the architectural heritage be further examined and to include the input of a design professional with considerable conservation experience and expertise (such as a conservation accredited architect or engineer) to devise ways in which the impacts on the architectural heritage can be lessened rather than increased. Within the submitted documentation specific interventions that directly impact on the original or historic fabric of protected structures or industrial heritage elements such as 19<sup>th</sup> century rail bridges needs further exploration and development as outlined in the subsections below.
- To ensure consistency of approach along the route the requirements of Dublin City Council's Conservation Office as set out in Section 21.3.4.1 of the Environmental Impact Assessment Report should be applied for the whole route, including Fingal.

### ***Overbridge Designs***

Four new overbridges are proposed within the Fingal area at Ashtown, Coolmine, Porterstown and Clonsilla. Two different designs are indicated in the drawings. It would be preferable for one consistent, high-quality bridge design to be utilised throughout. Due to the level of statutory natural and architectural heritage designations within or along the Royal Canal the new bridges need to have an aesthetic quality to their design and to be light and subtle insertions that minimise visual and physical impacts on the banks of the canal.

The bridges at Ashtown and Coolmine are similar to each other. The supporting columns for these bridges are slim structures that are architecturally appealing along with the curved lines of the access ramps. However, the solid nature of the parapets to the extensive linear length of ramp and bridge deck result in visually dominant structures. It was previously requested by the Council that the use of railings to allow permeability and lighten the appearance of the bridge design be considered (at least along the outer extents of the ramps if security concerns required more solid elements over the rail line). The treatment of the interventions at Preston Street for Connolly Station and Broombridge in Dublin City and for the new footbridge at Cope Bridge, Leixlip, Co. Kildare indicate that this is possible.

The overbridge at Porterstown, which sits within the grounds of the protected structure of the Former Clonsilla Schoolhouse (also known as The Old Schoolhouse), with its precast concrete parapets to the bridge deck, deck slab, beams and columns is not considered appropriate for this setting. It has a utilitarian palisade fence erected between it and the protected structure and also requires the alteration of the bank of the Royal Canal with the insertion of a retaining wall. This significantly alters the setting and character of the protected structure of the Royal Canal.

The design of the proposed overbridges in Fingal requires further development and should be agreed with Fingal County Council's Conservation Office. A consistent, high-quality design is required for all four proposed overbridges that minimises the physical alteration of the protected canal bank and tow paths in the positioning and type of supporting columns proposed and is as light and permeable a design as possible for the bridge and access ramps.



### ***Alteration of Arches & Parapets of Historic Masonry Bridges***

Due to the number and scale of interventions along the proposed route on the various existing railway bridges, from a conservation perspective the lowering of the track (rather than the raising or alteration of historic bridge decks) would be preferable. The Council understands that the challenges to achieve such a solution have been assessed and are considered too onerous to overcome. Where lowering is possible in individual locations, however, for example at Castleknock Road, it should be the preferred option. Notwithstanding that, where bridge parapet and deck alterations are considered unavoidable, such works should be consistent along the route.

It appears that no changes are proposed to OBG 13 at Westmantown to either the arch or the parapet. This was raised as a possibility during consultations, but the Conservation Officer questioned the necessity do to the rural location. The removal of those proposed alterations to this 19<sup>th</sup> century history masonry rail bridge is welcomed.

### ***Site Compounds***

The location of all proposed site compounds must have regard to impact on any heritage. Site compounds should not be placed in sensitive locations such as directly against or within the grounds of protected structures, or within historic designed landscapes. An alternative site for the proposed compound at Ashtown should be identified that is less impactful on Ashton House. The compound adjoining Ashtown Mill is possibly on the site of the water channel that fed the mill pond and could be a potential habitat for protected species. The compound to the east of Clonsilla Road contains the only example of extant, conjoined ring barrows (DU03-018) in Fingal and appropriate protection measures should be specified for works to be undertaken during the construction phase.

### ***Service and Substation Buildings***

There is significant potential visual impact from the substation structures on the Royal Canal at Coolmine and Hansfield. More detailed drawings should be provided of the Substation Buildings. IF more modest structures are possible, they should be considered along with mature planting and other screening measures.

### ***Architectural Heritage Considerations at Ashtown***

Ashton House is a historic house set in historic designed landscapes with layouts, planting schemes and trees that are centuries old. Ashtown Mill is a significant piece of industrial heritage while the Royal Canal and its associated structures is a major feat of 18th century engineering innovation. There is a need for further clarity on the potential impacts to Ashton House and additional visualisations and detailed drawing are requested in this regard. Views 14, 15 & 16 do not provide sufficient information to allow adequate assessment.

The impact to the Mill Complex & Mill Pond at Ashtown Mill is also difficult to consider in the absence of suitable documentation by the applicant.

### ***Existing Trees and Hedgerows***

Objective DMS80 of the Fingal's County Development Plan states: Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments. Hedgerow townland boundaries to be clearly identified on plans and any proposals to remove them should be clearly stated. Trees and hedgerows to be surveyed and protected in accordance with BS5837 (2012) *Trees in relation to design, demolition, and construction*

The quantity and quality of trees and hedgerows to be lost should be clearly stated as the design is developed. Ideally there should be no net loss of tree or hedgerow as a result of this scheme. In this regard, it would be useful for the scheme promoter to consider providing a clear statement that any replacement tree/ hedgerow planting shall be equal if not greater than the number and quality of trees lost as a result of this development.

### ***Visual impacts and Landscaping***

The electrification of the route may give rise to a requirement to visually screen overhead wires and associated structures to protect views of historic features such as bridges or buildings or to reduce the visual impact on protected landscapes, particularly along the Liffey Valley. This should be accounted for in the detailed landscape plans and visual impact assessments conducted. This should extend to substation design and location, together with all screening and materials for building.

The impact of temporary depots / sub stations proposed on parkland areas in terms of loss of vegetation, temporary and permanent screening, diversion of pedestrians and general landscaping needs ongoing consideration. In relation to the proposed sub-station at Laurel Lodge, its location, access and integration into the design and layout of this park needs to be fully considered to minimise impact on the park.

### **SURFACE WATER DRAINAGE**

Fingal County Council notes the contents of the DART+ West Project Strategic Flood Risk Assessment (SFRA) (July 2022) carried out by Roughan & O'Donovan/IODM as part of its preliminary design process.

Fingal County Council notes that primary infrastructure is classified as “highly vulnerable developments” in OPW Guidelines. The strategic flood risk assessment has shown that flood risk areas exist and that flood risk management measures have been adopted, with negligible effect on flood risk elsewhere. Fingal County Council notes the proposed development satisfies the requirements of the Justification Test (as described in the OPW’s *“The Planning System and Flood Risk Management Guidelines for Planning Authorities”*) and is therefore deemed appropriate for the associated flood risk.

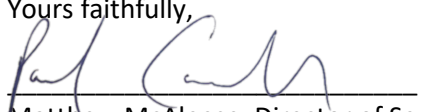
Fingal County Council promotes the implementation of nature-based solutions to the management of rainwater and surface water runoff in urban areas wherever possible. SuDS design for this project should be aligned with the principles of the best practice interim guidance document from the Department of Housing, Local Government and Heritage *“Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, March 2022.”* Flooding should be managed in accordance with OPW Guidance, The Planning System and Flood Risk Management Guidelines for Planning Authorities and Directive 2007/60/EC on the assessment and management of flood risks.

Fingal County Council welcomes the intention to pursue climate resilient design and construction solutions. The Council notes that any projects arising out of DART+ West Project will be required to comply with all relevant legislations and statutory guidance including flood risk assessment.

### **CONCLUSION**

In conclusion Fingal County Council welcomes the application for a Railway Order, the consultation stages to date and is confident of the significant benefits it will bring to Fingal and the wider Dublin region. FCC acknowledge the Dart+ West team’s meaningful and constructive engagement with our professional and technical staff over recent months. The Council acknowledges and welcomes the changes that have been made to the proposed scheme since previous design iterations and looks forward to addressing the remaining issues set out above, in order to ultimately achieve a high-quality outcome that will serve all sections of the community for decades to come.

Yours faithfully,



pp Matthew McAleese, Director of Services  
Planning and Strategic Infrastructure Department