

An Bord Pleanála
64 Marlborough St.
Dublin 1
D01V902

27th October 2022

DART+ West Electrified Railway Order 2022

Dear Sirs,

Waterways Ireland wishes to make observation on the DART+West Railway Order application as follows.

Waterways Ireland owns and maintains the Royal Canal and its towpaths which run parallel to the railway along the majority of the length of the Railway Order application. The proposed railway works will make significant interventions on the property ownership of Waterways Ireland at a number of locations. Appropriate short term licensing and longer term property arrangements will be necessary to put in place. It should be noted that Waterways Ireland is a North South Body and as such any property disposals first require Departmental and North South Ministerial Council approvals.

The Royal Canal has a proposed designation as a Natural Heritage Area from the Wildlife Act and all proposals must address requirements from this. Canal water quality is measured against the Water Framework Directive standards and is to a very high standard, so no new stormwater discharges are permitted to its waterbody. The canal is an important habitat and all legal environmental procedures must be followed to ensure protection of its flora and fauna, in particular otters and other protected species, both at construction stage and in the permanent works.

The Royal Canal is an important heritage asset in its entirety and there are also various locks, bridges and sections of canal channel that are listed on the Record of Protected Structures and have associated protections through Planning legislation. All proposed changes should account for the legal protections and the overall concept of the canal as a heritage structure. The proposed changes within the canal environs will also require further landscape character assessment.

The Royal Canal and its towpaths are working assets open to daily public use. This is both in terms of navigation for boat and other water-based recreational uses, and for the towpaths which are pedestrian & cycle recreational corridors for much of the route parallel to the proposed works. All of these activities require to be adequately accommodated and maintained, both throughout the works and in the permanent arrangements.

The Royal Canal is also a water corridor and as such can carry flooding risks if water movement is not suitably managed. All works must consider and take measures to minimise or eliminate these risks.

Waterways Ireland wishes to raise concerns that the proposed increased train frequencies will further limit the operation of the Newcomen Lifting Bridge in Spencer Dock. Waterways Ireland considers that the DART+ West project should contain adequate upgrades to protect and enhance the currently restrictive arrangements for canal navigation in this area. The existing lift bridge arrangements are restrictive to canal operation and require further investigation for upgrades in order to provide more sustainable future operating arrangements.

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Waterways Ireland have met with Iarnród Éireann and their consultants as part of design development but all future property, operational, environmental and legal issues for construction stage will have to be addressed in advance of any works taking place on Waterways Ireland property.

Yours faithfully,



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