Dart + South WestRailway Order   
South Dublin County Council Submission

Land Use and Planning Department

South Dublin County Council

Revision V3

15 May 2023

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**Dart+ South West Railway Order:**

**South Dublin County Council Submission:**

1. **Introduction:**

Iarnród Eireann has lodged an application for a Railway Order for the Dart+ South West project with An Bord Pleanála.

I can assure the Bord that all documentation relating to this application was made available for inspection/purchase by the Public at our offices in accordance with the public notices of the application.

As a prescribed body, South Dublin County Council is making this submission as part of the statutory consultation process. This submission contains our views on the key issues that may affect our LA during the delivery of the proposed Dart + Southwest scheme.

The various service departments within South Dublin County Council have been consulted during this consultation period and the individual reports from each department have been collated into this overall SDCC submission.

1. **The Key Elements of the Dart+ South West Project:**

* Completion of four-tracking from Park West & Cherry Orchard Station to Heuston Station,

extending the works completed on the route in 2009.

* Diversions for utilities located along the route as part of the enabling works for the project.
* Construction of overhead line equipment (OHLE) from Hazelhatch & Celbridge Station to Heuston Station and also from Heuston Station to Glasnevin Junction, via the Phoenix Park Tunnel Branch Line.
* Signalling upgrades and additional signalling infrastructure.
* Telecommunications infrastructure including buildings.
* Construction of a new portal structure at the South Circular Road Junction.
* Works to Phoenix Park Tunnel including horizontal and vertical realignment to ensure that electrical and passing clearances are achieved.
* Construction of six electrical substations at intervals along the rail line to provide power to the network.
* Undertaking improvements/reconstructions of bridges to achieve vertical and horizontal clearances.
* Construction of new retaining walls to enable widening of the rail corridor and replacement bridges.
* Construction and delivery of a new ‘Heuston West’ Station.
* Provision of construction compounds to support the construction works.
* Undertaking improvements/reconstructions of bridges to achieve vertical and horizontal

clearances.

* Addressing track alignment constraints along the Phoenix Park Tunnel Branch Line to support increased frequency of trains (i.e. improve capacity).
* Re-signal and modernise lineside telecommunications, as necessary.

Works outside of Córas Iompair Éireann lands will be required at a number of locations for some of the scheme elements such as:

• Widening of the railway corridor for four-tracking between Park West & Cherry Orchard Station and Heuston Station;

* Bridge reconstruction and/or improvements;
* Construction of substations (to facilitate the provision of power to the line); and
* Use of land for temporary construction/storage compounds and all ancillary works required for the project.

1. **Key Benefits of Dart + South West Project:**
   1. Increase peak passenger capacity from approx. 5,000 to 20,000 per hour per direction and increase train frequency (subject to demand) between Dublin City and Hazelhatch & Celbridge.
   2. Enhance public transport opportunities for work, education and leisure.

4.3 Facilitate the development and future growth of existing and new communities that will greatly benefit from the connectivity that the DART+ Southwest will deliver including Adamstown, Clonburris and Cherry Orchard / Park West.

4.4 Improve multimodal transport connectivity through interchange with the Luas at Heuston station, Bus Connects and the proposed MetroLink.

4.5 Facilitating people to make sustainable travel choices by encouraging a move away from private cars to reliable, efficient and safe public transport network.

1. **Previous Supporting Work Carried out in the SDCC Local Authority:**

Previous supporting works have been carried out under the Kildare Route Project. These include:

* 1. There is an existing four-track line between Hazelhatch-Celbridge Station and Park West and Cherry Orchard Stations.
  2. Several of the bridges along this same section have been reconstructed.

**5.0 SDCC Teams Comments on the Application:**

SDCC have identified several areas that the delivery phases of this project may have an impact in our Local Authority area: SDCC want to ensure that the Project has sufficient mitigation measures in the form of conditions to address these potential concerns.

**SDCC Development Management Team Comments:**

The proposed service would be very welcome from an operational point of view, as it will support more efficient and intensive use of brownfield serviced urban sites, sustainable and vibrant communities, as well as housing delivery and plan-led development.

The most pertinent statutory planning policy documents are the County Development Plan 2022-2028 (includes policy framework for Newcastle), Clonburris SDZ Planning Scheme (from 2022 - around 7000-11,000 dwellings) and Adamstown (from 2022 - 5240 dwellings) SDZ Planning Scheme. The non-statutory City Edge Plan (joint with Dublin City Council) would also benefit from Dart Plus South West as Park West Station is located close to this area, up to 2050 a build-out of 400,000 dwellings and 75,000 jobs is anticipated.

The applicant may gain access to SDCC planning guidance documentation such as the planning register, the DCC County Development Plan, Strategic development Zones, Local Area Plans and the City Edge Project at the following link: [Planning - SDCC](https://www.sdcc.ie/en/services/planning/)

**Strategic Development Areas**

The opening of new train stations and the capacity, journey time and frequency improvements associated with Dart+ South West will greatly enhance the quality of life in South Dublin County generally and contribute to the reduction of carbon emissions.

DART+ South West will be an important contributor to the delivery of housing, compact growth, employment, reduction in carbon emissions and facilitating a modal shift across SDCC and Greater Dublin. There are several key regeneration landbanks across South Dublin where increased transport investment, such as that set out in the DART+ programme, is required to support the delivery of growth. It is important that infrastructure links are incorporated within the Dart+ Southwest project to serve these locations. Therefore, the existing and proposed rail stations should include the necessary, facilities such as car parking, cycle parking, footpath and cycle lane connections including safe pedestrian road crossings to link to these growth areas. This will be particularly relevant at Adamstown, Kishoge and Clondalkin/Fonthill stations and a future station at Kylemore.

**SDCC Forward Planning and Delivery Team Comments:**

The main strategic growth locations of national priority in proximity to the Dart+ South West project within South Dublin County are:

1. **Clonburris SDZ:**

**Background**

Clonburris SDZ contains 280 hectares of land bisected from east to west by the existing Dublin to Cork/Kildare railway with two train stations at Kishoge (built, but non-operational) and Clondalkin/Fonthill (operational). The Clonburris SDZ Planning Scheme provides a blueprint for the delivery of up to 11,000 new homes, public amenities and supporting non-residential uses. Two high-density mixed-use urban centres are proposed adjacent to the train stations.

**Housing Delivery**

It is important that the delivery of DART+ is in tandem with development. In this regard, SDCC is working together with other landowners within the SDZ to deliver on an ambitious housing and infrastructure delivery programme. To date, approximately 1,240 residential units have been granted planning permission within Clonburris SDZ with construction commenced on a site in the vicinity of Clondalkin/Fonthill Station and construction set to imminently commence on three other sites. Planning permission has been sought for another approximately 1,140 residential units which are currently awaiting decisions. Overall, it is intended that there will be up to 6,000 homes completed across the scheme by 2027, with approximately 15,000 people living, working and commuting to, from and within the SDZ lands. It is therefore requested that the Dart+ South West programme is implemented at the earliest opportunity in order to ensure adequate capacity and modal choice is available for future and existing residents to achieve the creation of a vibrant and sustainable community. SDCC would welcome a regular dialogue with all stakeholders to ensure this is achieved.

**Infrastructure Delivery**

In recognition of its status as a site of national importance for the delivery of housing, SDCC has been awarded c.€207m in public funding (URDF and NTA) towards the delivery of the strategic infrastructure in Clonburris which is necessary to serve this new area, including new streets, bridges, parks, community centres and water, wastewater and surface water infrastructure. SDCC and the three main private landowners in Clonburris SDZ own over 90% of the land for development. SDCC is working with these partners and Clonburris Infrastructure Limited, which has been set up specifically to deliver this programme of strategic infrastructure works.

**Kishoge Station**

Given the existing demand that exists and the activity taking place in Clonburris, SDCC supports the opening of Kishoge Train Station at the earliest opportunity possible and is working with both Irish Rail, the NTA and surrounding landowners to ensure that this can happen.

**Bridges**

The Clonburris SDZ Planning Scheme requires 4no. new overbridges across the rail line within Clonburris SDZ, including a green bridge, 2no. pedestrian bridges and a vehicular bridge. SDCC is working with the other landowners in the SDZ and Clonburris Infrastructure Limited (CIL) to progress construction of these bridges. In this regard, CIL have made initial formal submissions to Irish Rail 3rd Party Coordinator in relation to these bridges. Accommodation of this work will be necessary.

**Utilities**

There are several new utility services in Clonburris which will interface with the railway line, which also need to be accommodated and considered in the Dart+ works proposal. See Figure 1 which indicatively identifies the location of these utility crossings which was issued to Irish Rail in September 2022.

Diagram

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**Figure 1: SDCC/CIL Railway Utility Crossings**

On the ‘Works Layout Plan No. 07’, it is noted that there is a proposal for diversion of an existing overhead ESB line to an under-track crossing. The following points should be carefully considered and we would welcome further dialogue:

1. SDCC and CIL are delivering a watermain in this area which will cross underneath the railway track. This watermain is critical for the water supply to Clonburris SDZ. It is critical that these works are closely coordinated. SDCC have met with Irish Rail on this point and would welcome further collaboration to ensure that both works can be delivered without interfering with the space required for the other.
2. In terms of the temporary land take and site access required for the undergrounding of the ESB line, this requires further consideration. SDCC has planning consent for the construction of 263 new homes on this land which should be in place or at least under construction by the time these Dart+ works commence. Plans of this development were shared with Irish Rail in September 2022. SDCC will work with Irish Rail to ensure that the ESB diversion can be facilitated, but consistent with SDCC’s housing plans. The directional drilling pits and timelines will need close coordination between the parties.

Further detailed Information on the HV and Watermain diversion route options is contained in 4no. Consulting Engineers drawings from Aecom which is attached to this submission. Attached file: 2023-05-09 Phase 1 HV Cable Layout Options.pdf.

**Kishoge Substation**

SDCC note the location of the proposed substation on the ‘Works Layout Plan No. 07’. This location is agreeable to SDCC in principle, and we welcome Irish Rail’s engagement on this matter. It is noted that the substation compound area extends to include an existing access off Adamstown Avenue to a disused car park. SDCC wishes to see this access point retained, at least on a temporary basis, and therefore requests further engagement with Irish Rail to coordinate timelines and agree an acceptable solution. This location would ideally be utilised for Stage 2 of SDCC/CIL’s strategic infrastructure plans as a connection point for watermains to strategic Irish Water infrastructure in Adamstown Avenue.

1. **Adamstown SDZ**

Adamstown SDZ has a total designated area of 223.5 Hectares with potential to accommodate up to 9,395 residential units (c.25,000 population equivalent). Home to a purpose-built train station since 2007, a total of c.7,200 residential units have been granted planning permission with c.3,700 units completed as of Q4 2022. It is envisaged by Q1 2023, the number of units completed will surpass 4,000. The Planning Scheme is in Phase 5, with the majority of the requirements built out or in progress.

Dart+ SouthWest will be of significant benefit to the existing and future residents of Adamstown and the surrounding area. Of notable consideration is the new district centre adjacent to Adamstown Train Station. The District Centre, or the Crossings, has two large retail units, now occupied, 16 smaller retail units, some of which will be occupied in the next number of months, a large urban plaza, and small market street (which provides a pedestrian link from the station). Additionally, there are several hundred residential units either completed, under construction, or granted planning. This area is home to the denser building typologies so the numbers of people in and around the area are likely to be higher than the rest of Adamstown.

Given the level of delivery (both housing and retail/commercial) in and around the District Centre, and station, it is important to consider the ongoing levels of construction, generally, in the area.

Lastly the Adamstown Station Road is generally busy with construction traffic, commuter traffic and pedestrians, which may be impacted by works at the station.

**The following is noted in relation to the proposed works at Adamstown SDZ:**

**Permanent Works**

The duct routes and cables for the undergrounding of the existing ESB Networks line at 6.04 and 6.05 is directly on top of the twin rising mains (350mm and 500mm ductile iron) and associated large air valve chamber from Tobermaclugg Pumping Station.

**Temporary Works**

The directional drilling access pits are right on top of the existing air valve chamber and twin rising foul water mains from Tobermaclugg pumping station.

Generally, it is important for Iarnród Eireann to liaise with the relevant Adamstown developers and SDCC to ensure that any 3 phase feeds to the substation do not affect pre-existing or proposed SDZ infrastructure.

There is a proposal to modify Crowley’s bridge. It is important for Iarnród Eireann to liaise with the relevant third-party developers, private owners and SDCC to ensure that any proposed changes are agreeable to all stakeholders. This works item is listed as (OBC20E) in the schedule of works.

1. **Clonburris SDZ:**

**Background**

Clonburris SDZ contains 280 hectares of land bisected from east to west by the existing Dublin to Cork/Kildare railway with two train stations at Kishoge (built, but non-operational) and Clondalkin/Fonthill (operational). The Clonburris SDZ Planning Scheme provides a blueprint for the delivery of up to 11,000 new homes, public amenities and supporting non-residential uses. Two high-density mixed-use urban centres are proposed adjacent to the train stations.

**Housing Delivery**

It is important that the delivery of DART+ is in tandem with development. In this regard, SDCC is working together with other landowners within the SDZ to deliver on an ambitious housing and infrastructure delivery programme. Overall, it is intended that there will be up to 6,000 homes completed across the scheme by 2027, with approximately 15,000 people living, working and commuting to, from and within the SDZ lands. It is therefore requested that the Dart+ South West programme is implemented at the earliest opportunity in order to ensure adequate capacity and modal choice is available for future and existing residents to achieve the creation of a vibrant and sustainable community. SDCC would welcome a regular dialogue with all stakeholders to ensure this is achieved. There are further comments in Observation 2 that relate to Kishoge station.

1. **SDCC City Edge Project Team Comments:**

**Introduction**

The City Edge area has been identified as a major brownfield regeneration area with the potential to delivery 40,000 homes and 75,000 jobs between now and 2070.  A Strategic Framework has been prepared for the area setting out a high level vision and identifying a number of critical infrastructure elements required to support this level of development I attach following file to this submission [City-Edge-Strategic-Framework-August-2022-Final.pdf (cityedge.ie)](https://eur04.safelinks.protection.outlook.com/?url=https%3A%2F%2Fcityedge.ie%2Fwp-content%2Fuploads%2F2022%2F08%2FCity-Edge-Strategic-Framework-August-2022-Final.pdf&data=05%7C01%7CJHegarty%40SDUBLINCOCO.ie%7C5d6121f65eef4a3349d808db55f40842%7C6a3c00c019d0492da8de95fad8fda1d4%7C0%7C0%7C638198278841838998%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=ZE57ow7mX0tBJVPsm6ovoqks2LBMzqHcOAG7iJajwik%3D&reserved=0).  The proposals include a rail station at Kylemore which has been identified as a location for a major centre and transport interchange, where the Kildare Line and future Luas to Lucan will converge.   In this context, we are pleased to note that the draft proposal has future proofed the design of the Kylemore Road bridge to take the loading of a future LUAS line and also passively provides for an Iarnród Eireann station at Kylemore.  We would emphasise the critical importance that these elements of the proposal are retained in the final design, in order to support the future homes, employment and major centre to be located in this area.

SDCC also wishes to seek early engagement with the NTA and Irish Rail to ensure any potential plans for the DART + Tunnel are appropriately integrated into the City Edge Strategic Framework.

**Kylemore (Park West) Station and Rail Interchange**

The City Edge Strategic Framework identifies the major infrastructure interventions required to ensure the City Edge area is regenerated in a sustainable manner. In order to take advantage of

• the future Luas line to Lucan and

• the upgrade to a high-capacity service associated with DART + South West,

One of the infrastructure projects identified is a new station and high-capacity public transport interchange at Kylemore. Building on this, the City Edge Strategic Framework also identifies a new mixed-use centre focussed around the new Kylemore station and interchange.

It is noted that a new station at Kylemore is identified as part of the GDA Transport Strategy. However, a recent briefing given to SDCC in December 2021 regarding DART + SW confirmed that ‘the Preferred Option will be compatible with future stations at Kylemore and Cabra, although the construction of these stations is not part of the DART+ South West project’.

In this regard, SDCC would request Iarnród Eireann and the NTA to reconsider inclusion of the station at Kylemore as part of the current Preferred Option and to make provision for an interchange with the Luas line to Lucan. A station and rail interchange at this location would make optimal use of the opportunity afforded by the future rail infrastructure and would be a critical intervention to facilitate the sustainable delivery of City Edge.

In overall terms, DART + SW provides a potentially important transport intervention and the increased frequency and capacity of service could facilitate the achievement of the City Edge project objectives of sustainability, liveability and development of active and public transport. However, this would be subject to the provision of the Kylemore station and interchange. Currently, the Park West/Cherry Orchard Station is too remote from City Edge to be within walking distance for many future residents/workers and there is no station existing or proposed between Park West/Cherry Orchard and Heuston.

**City Edge Team Section Conclusion:**

The current proposal should be cognisant of the later phased development of a rail interchange at Park West/Kylemore to take advantage of high-capacity DART + South West rail services and the Luas line to Lucan and to facilitate the future location of a new mixed-use centre as part of City Edge.

City Edge represents a unique opportunity to achieve the government policies of compact growth and transport-oriented development, at scale.

However, continued engagement between all stakeholders including SDCC, DCC, the NTA and Iarnród Eireann, is critical to ensure that the opportunity offered by City Edge is successfully harnessed. SDCC requests that its views in relation to the DART + South West project as it affects City Edge are taken on board, and looks forward to collaborating with the NTA and Iarnród Eireann in relation to the delivery of the City Edge Strategic framework (This document is attached to this submission) and the subsequent statutory plan.

1. **SDCC Water and Environment Section Comments**

**Fonthill Station: below**

Any proposed works shall be done such that they protect the existing:

Water -  24” asbestos watermains and Foul – 1050mm foul sewer as per Irish Water Standards. A snip of the existing water and foul services is copied below:

A picture containing text, diagram, screenshot, line

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**Water and Environment Comments continued:**

**Kishogue Station below**

Any proposed works shall be done such that they protect the existing:

Existing Foul 75mm rising main as per Irish Water Standards.

Existing Water -  Two watermains as per Irish Water Standards.

**A screenshot of a map

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**Water and Environment Comments continued:**

**Adamstown Station below:**

Existing  225mm Foul sewer north of site as per Irish Water Standards.

Existing Water -  Two number north of site as per Irish Water Standards.

**A screenshot of a map

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**Suggested Planning Condition:** The applicant shall liaise with the Water Environment Section of SDCC and Irish as appropriate in relation to any proposed works close to the existing water and foul services.

**Suggested Compliance Condition:** Applicant shall obtain confirmation of a feasibility study proving adequate capacity exists in the network from Irish Water prior to commencement of development.

**6.0 SDCC Key Observations:**

**Observation 1: Transport Integration**

“The project will link Iarnród Éireann, DART, Dublin Bus, Luas, MetroLink and Dublin Bike services to create a fully integrated public transport system in the Greater Dublin Area. It is important that this project links to existing SDCC public transport and active travel networks. It is further important that sufficient consultation is made with SDCC and other transport stakeholders to ensure that Dart + Southwest delivers sufficient travel integration to the proposed growth centres of Adamstown, Clonburris and the City Edge Project.

Whilst we understand some improvements will be carried out to existing stations, it is equally and vitally important that improvements to areas immediately surrounding stations are also improved to ensure integration with existing and planned transport including walking, cycling, bus and taxi. Local public realm and public transport integration schemes should be progressed at each station. This should include a package of localised works to achieve these aims. As part of this it is important that sufficient consultation is made with SDCC and other transport stakeholders to ensure that Dart + Southwest delivers sufficient travel integration to the proposed growth centres of Adamstown, Clonburris and the City Edge Project.

**Observation 2: Important Infrastructure Delivery dates.**

The opening of Kishoge Train Station is an important priority for SDCC, as well as a phasing requirement of the SDZ Planning Scheme. While there is already significant demand for the opening of Kishoge Train Station in the local area, new housing delivery will begin construction in the Clonburris SDZ adjacent to the Kishoge Train Station in 2023 with completion of housing in late-2024. It is therefore requested that the timeline for opening of Kishoge Train Station tie in with the delivery of homes in 2023/2024.

**Observation 3: Important Utility and Infrastructure Links.**

There are a number of pieces of existing infrastructure which cross the railway line, including the existing gas pipeline from Grange Castle. It important to ensure that any additional utility links or upgrades across the railway line are constructed prior to the electrification of the route. This will be particularly relevant in the Clonburris SDZ and Ballymount/ Naas Road regeneration lands.

Existing and proposed Utility corridors need to be protected or facilitated. The infrastructure delivery programme for the Clonburris SDZ includes the provision of 2no. foul drainage rising mains crossing under the railway line within the SDZ lands. One is c.200m east of Clondalkin/Fonthill Station and the other is c.400m east of Kishoge Train Station. In addition to this, future provision of energy supply (gas and electricity) will need to traverse the railway line. Please see attached note from Clonburris Infrastructure Limited (CIL) for more detailed information. SDCC and its partners have initiated engagement with Irish Rail in relation to these items and request that they are taken into account by proposed Dart+ South West project.

**Observation 4: Pedestrian and Vehicular Bridges.**

Any bridges that require changes to the parapets and walls should be designed in an aesthetically pleasing fashion. If amendable, bridges should be ‘future proofed’ to handle the further expansion of cycle and pedestrian paths.

There is a proposal to modify Crowley’s bridge. It is important for Iarnród Eireann to liaise with the relevant third-party developers, private owners and SDCC to ensure that any proposed changes are agreeable to all stakeholders. This works item is listed as (OBC20E) in the schedule of works.

There are a series of existing overbridges along the proposed line that need to be structurally assessed within this project. There shall be a number of additional pedestrian and vehicle linksacross therailway line at Clonburris and as part the Naas Road regeneration project. This project must not preclude these future permeability links.

There are proposals to make several modifications to existing SDCC bridges to facilitate electrification. These bridges include Finnstown Road Bridge, Kishoge Bridge, Clondalkin Fonthill Station Road Bridge, Ninth Lock Bridge and the Cloverhill Road Bridge. The applicant shall ensure sufficient consultation with SDCC for any modification proposals.

The infrastructure delivery programme for the Clonburris SDZ includes the provision of 4no. bridges over the railway line in the SDZ lands (a vehicular bridge, 2no. pedestrian bridges and a green bridge). SDCC and its partners have initiated engagement with Irish Rail in relation to these and request that these links are facilitated and not hindered by the delivery of the Dart+ Southwest project.

**Observation 5: Electricity Substation locations and overhead or underground routes.**

The installation of any required ESB substations and connecting lines from suitable power source locations on the existing electricity network. One will be on Iarnród Eireann owned lands at Hazelhatch Station (Kildare), at Adamstown and one in Clonburris. The siting of these substations must be cognisant of the pre-existing planning proposals and must be sensitively sited not to mar important residential, community or amenity areas.

These substations will need a site and possibly underground ducting or overhead line connections from the existing ESB network. Effective consultation on the location of these services with the relevant SDCC departments will be necessary as these sites will impact on lands within the SDCC local authority area.

The proposed location of the permanent ESB substation at Adamstown Station works item 5.03 in the schedule of works is acceptable. The use of the existing gravel service road is acceptable. However, a maintenance programme of road sweeping of the surrounding private lanes and public road network (R120) is required to ensure that it is kept clear of dirt and dust.

The proposed location of the permanent Kishoge ESB substation (works item 7.02 in the schedule of works) is acceptable. This will also be temporarily used as a construction compound.

The temporary use of the existing gravel road track as access to works compound (works item 7.07) is acceptable. However, a maintenance programme of road sweeping of the surrounding public road network is required to ensure that it is kept clear of dirt and dust (R136)

**Observation 6: Temporary Site Compound Locations.**

SDCC understand that a number of temporary site locations will be needed along the section of the works to facilitate storage and welfare facilities during construction. The siting of proposed site compounds will become the focus of much of the HGV traffic generated by the project. The local road network needs to be maintained to the same pre-construction standards.

Each site must have vehicular sightlines, suitability of the haul routes to each compound, pre-video surveys of the local road network, remedial work protocols should damage occur on the private lanes and public road network and decommissioning protocols to satisfactorily reinstate the sites post project will be needed. Suitable site carparking for workers to avoid overspill parking to unsuitable locations. Protocols should be put in place to manage noise, dirt and dust suppression during the loading and unloading and storage of construction materials at these site compounds.

**Observation 7: Site Working Hours.**

SDCC require details of the daily working hours, any weekend work or any exceptional departures from normal working hours during the course of the project.

**Observation 8: The Generation of Construction Traffic.**

The Traffic Management plan shall include but not be limited to thoroughly analysing the potential impacts and managing the following items:

* The developer must be cognizant the construction activities of other developments progressing at the same time as this proposed project. For example, in the next few years, considerable construction activity will be taking place at completing Adamstown SDZ and commencing the Clonburris SDZ developments, and other zoned locations in South Dublin. The timing of Dart + South West construction activities should be phased to avoid excessive construction traffic at particular locations and on particular roads.
* Any temporary road closures or active traffic control restrictions required at any locations in the SDCC area. Any temporary diversion routes need to be agreed with SDCC.
* The developer shall Identify and agree suitable haul routes with the Roads department of SDCC.
* Information to be forwarded to SDCC on the no. of daily loads on each haul routes.
* Management of haulage around peak traffic times.
* Pre and post video surveys of public road haulage routes and protocols for repairs of public roads in the event of damage caused by this project.

**Observation 9: Construction Waste.**

There must be detailed management protocols for waste management during construction. SDCC would strongly encourage the sustainable disposal and reuse of materials. Also, the selection of material suppliers shall take into consideration the proximity to site to reduce haulage carbon emissions.

**Observation 10: The Protection of Archaeological and Architecturally Significant Sites.**

Sufficient archaeological, heritage and architectural studies and investigations need to be undertaken in areas where these features and structures exist.

**Observation 11: Environment Impact Assessment Report (EIAR).**

Sufficient Environmental assessment and monitoring studies to be carried out in any designated environmentally sensitive areas. It is noted that there is a need for additional security fencing on both sides of the rail lines. SDCC will require detail on the effect on mature trees and significant hedgerows that may be affected. Consultation with our parks department is required in relation to this observation.

**Observation 12: Survey and Site Investigations**

**Noise Management**

SDCC would like to ensure that noise surveys are conducted throughout the project to ensure that the relevant thresholds are not exceeded.

**Observation 13: Track Security and Protections against electrocution.**

SDCC are interested in the designs around track security and management systems are in place to guard against trespass and or accidental electrocutions by members of the public. I refer you to Observation 12 and the possible effect of these boundary works may have on existing trees and hedges and the requirement for consultation with the parks department.

**Observation 14: Section 48 and 49 Development Contribution Schemes:**

Section 11 of the SDCC Development Contribution Scheme (2021 2025) outlines that Infrastructure projects are exempt from any requirement for a Development contribution.

Additionally, there is no requirement of a Special Contribution to be levied for this development**.**

**7.0 Summary Remarks:**

Iarnród Eireann has extensively engaged with South Dublin County Council through the various Planning Stages of the Dart + South West project. SDCC are happy that at each of these stages our comments and observations have been incorporated into the final design option which is the subject of this Railway Order process.

The project aligns with National, GDA Transport Strategy and the SDCC Development Plan Transport Policies for sustainable movement.

The delivery of this project facilitates some of the main development objectives contained in the SDCC County Development Plan 2022 -2028, namely reducing the carbon emissions of transport sector in our County and facilitating increased sustainable housing development and economic growth at key strategic locations in our County.

Specifically, the delivery of this project will facilitate the continued build out of the Adamstown and Cloburris SDZ’s and the sustainable redevelopment of the City Edge project.

In this report SDCC have outlined the key benefits of the proposed scheme within our Local Authority area. The report identifies some of the possible impacts the scheme may have in our area of responsibility.

SDCC are making 14 no. observations covering planning, design and construction elements of the proposed project.

Should suitable conditions be attached to the decision, SDCC are confident that sufficient mitigation measures will be in place to successfully manage the project in our Local Authority area.

Should this Railway Order application be granted, SDCC look forward to further consultation and cooperation with Iarnród Eireann in delivering this sustainable transport project for the mutual benefit of our respective organisations.