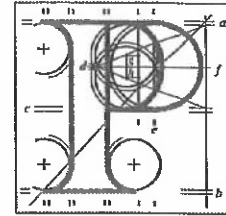


**Our Case Number:** ABP-316119-23

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Development Applications Unit  
Government Offices  
Newtown Road  
Co. Wexford  
Y35 AP90

**Date:** 26 May 2023

**Re:** DART+ South West Electrified Heavy Railway Order - Hazelhatch & Celbridge Station to Heuston Station, and Hesuton Station to Glasnevin  
County Dublin and County Kildare

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glao Áitiúil</b>	<b>LoCall</b>	1890 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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## Eimear Reilly

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**From:** SIDS  
**Sent:** Tuesday 16 May 2023 15:16  
**To:** Eimear Reilly  
**Subject:** FW: ABP Ref: ABP-316119-23 Our Ref: SID-ABP-2023-009 - DART+ South West Railway Order  
**Attachments:** ABP-316119-23.pdf

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**From:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Sent:** Tuesday, May 16, 2023 2:18 PM  
**To:** SIDS <sids@pleanala.ie>  
**Subject:** ABP Ref: ABP-316119-23 Our Ref: SID-ABP-2023-009 - DART+ South West Railway Order

A Chara,

Attached please find the archaeological and nature conservation observations/recommendations of the Department in relation to the aforementioned Railway Order Application.

Can you please confirm receipt of same?

Kind Regards,  
Sinéad

—  
Sinéad O' Brien  
Executive Officer

—  
Aonad na nIarratas ar Fhorbairt  
*Development Applications Unit*  
Oifigí an Rialtais  
*Government Offices*  
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90  
Newtown Road, Wexford, County Wexford Y35 AP90  
—



Your Ref: ABP-316119-23

Our Ref: **SID-ABP-2023-009**

*(Please quote in all related correspondence)*

16 May 2023

The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

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

Re: Notification under Section 37 (1) of the Transport (Railway Infrastructure) Act 2001 (as amended and substituted).

**Proposed Strategic Infrastructure Development (SID): Railway Order application for a Railway Order for the DART+ South West Electrified Heavy Railway Order 2023. Subject to approval, the Railway Order will authorise CIÉ to carry out railway works and all works necessary to enable the construction, operation, maintenance and improvement from Hazelhatch and Celbridge Station (County Kildare) to Heuston Station Dublin (circa 16km) on the Cork Mainline.**

A chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated headings.

### **Archaeology**

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment which was carried out in relation to the proposed development by Courtney Deery Heritage Consultancy (EIAR Chapter 20; date February 2023). The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, the Department advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions* (October 2022), with



appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

**Archaeological Requirements:**

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 20 of the EIAR (Courtney Deery Heritage Consultancy; date February 2023) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 20 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
3. The Planning Authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

**Reason:**

To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

**Nature Conservation**

The proposed project which is the subject of the present application involves the electrification of the Cork Mainline from Hazelhatch and Celbridge Station to Heuston Station and the Phoenix Park Tunnel Branch Line from Heuston Station to Glasnevin Junction. It also encompasses the four-tracking of the mainline from Park West and Cherry Orchard Station to Heuston Station and the construction of a new Heuston West Station. The drainage systems serving sections of these rail lines will also be upgraded including the installation of attenuation tanks at Inchicore and Heuston Station.

The Natura Impact Statement (NIS) submitted in support of the present application identifies the possibility that in the absence of mitigation measures there is a danger that collisions with the Overhead Line Equipment (OHLE) to be installed on the Liffey Bridge on the Phoenix Park Branch Line will potentially result in the increased mortality of Qualifying Interest (QI) or Special Conservation Interest (SCI) bird species for certain of the Special Protection Areas (SPA) in the zone of influence of the proposed DART + South West Project. The species potentially concerned are the brent goose a SCI species for the South Dublin Bay and River



Tolka Estuary SPA, the North Bull Island SPA and the Baldoyle Bay SPA, the black-headed gull, a SCI for the former two SPAs, and the cormorant and herring gull, SCIs for the Ireland's Eye SPA. It is also considered that, unmitigated, there is the potential for pollution transported in surface water runoff from the presently proposed project to enter the River Liffey and by detrimentally affecting fish and invertebrate populations there to have adverse effects on cormorant and herring gull by reducing prey available for them to feed on.

The installation of hanging devices or bird deflectors to mark out to birds the OHLE to be installed on the Liffey Bridge is therefore proposed in the NIS, as well as a suite of measures to prevent the mobilisation of pollutants such as silt, oils and cementitious materials during the development phase of the DART + South West Project. The NIS concludes that with the adoption of these measures mortality of SCI species by collision with the OHLE on the Liffey Bridge will be minimised, and the effects of possible pollution mobilised during the construction phase of this project on prey of the SCI species cormorant and herring gull avoided. The Department accepts these conclusions.

However the Department notes from the documentation supporting the present application that it appears that no oil separators or other filtration devices are to be installed on the inflows to the attenuation tanks which are to be constructed in Inchicore and Heuston Station and which will then outfall to the Liffey as part of the new drainage system serving the DART+ South West project. Similarly though the Phoenix Park Tunnel drainage system is to be modernised as part of DART+ South West, no oil separator or other filtration device is proposed to be installed on the system's outfall to the Liffey which is to be retained in its present format. The Department considers that on the precautionary principle oil interceptors or other filtration devices should be installed on the above mentioned drainage systems out-falling to the Liffey so as to avoid any increased contamination of runoff with hydrocarbons during the operational phase of DART+ South West due to the planned higher number of train movements it is to cater for. Such an approach should assist in maintaining water quality in the Liffey to sustain all the biota living in or dependent on it including SCI species, and also river lamprey, salmon, and otter which are species included in Annex I of the Habitats Directive (92/43/EEC).

In the Environmental Impact Assessment Report (EIAR) supporting this application the results of surveys for potential bat roosts and bat activity surveys undertaken to enable assessment of the potential effects on bat species of the DART+ South West project occurring along its route. Based on these surveys the minimisation of light pollution and the installation of artificial bat roosts at various locations is proposed to reduce the impacts of the project on bat species. These mitigation measures proposed in general appear satisfactory and likely to succeed in reducing the effects on bat species of DART+ South West. However, it is not clear from the EIAR whether any bat roost survey was carried out of the mature trees present at Heuston Station on the banks of the Liffey which it seems are to be removed to facilitate the construction of the new Heuston West Station. If such a survey has not been undertaken, it should be carried out as soon as possible. Landscaping of this area should also take account of the need to maintain/restore a mature tree belt along the





Liffey in this area to minimise light spill onto the river and therefore sustain its usage by bat species and particularly the light sensitive Daubenton's bat which is usually restricted to feeding over water bodies.

The EIAR states no evidence of the occurrence of otter was identified during the course of field surveys of the DART+ South West project route but this species' presence on the route is assumed. In fact recent survey work carried out on the Royal Canal in connection with the proposed development of the Royal Canal Greenway by Dublin City Council has identified an otter holt in the vicinity of where works are to be undertaken as part of the presently proposed project on the Phoenix Park Branch Line as it runs under the Royal Canal Twin Arch Bridge. Works on the DART+ South West project in that area will have to take account of the presence of this holt and should be co-ordinated with the works on other transport infrastructure projects planned for this area including the Royal Canal Greenway and DART+ West.

The approach to minimising the effects of DART+ South West on bird species set out in the EIAR by avoiding the clearance of vegetation during the bird nesting season is satisfactory.

The vegetation survey work carried out along the DART+ South West route enabling the identification of the habitats present is in general also satisfactory, as is the approach which is to be implemented of retaining as much of the semi-natural vegetation present along this route as possible in the proposed landscaping. But in the 1980s three orchid species, namely the common spotted, fragrant and pyramidal orchid and other relatively rare calcicole plant species were recorded on railway embankments near the Royal Canal west of Cross Guns Bridge during survey work for *The Flora of Inner Dublin* Peter Wyse Jackson and Micheline Sheehy Skeffington (1984). Yellow-wort was also recorded during this survey work on a "railway embankment near Attracta Road". It is not clear from the records in the above publication if these species were growing at that time on embankments of Phoenix Park Tunnel Branch Line and have since been suppressed as a result of succession or whether they were actually growing on the embankments of one of the other rail lines in this area. But it would be desirable to have the situation with regards to the occurrence of these species clarified and if they are still present on the Phoenix Park Tunnel Line provision made for their retention in its landscaping.

It is noted that in the EIAR it is stated that a native flower seed mix is to be sown along the DART+ South West Route as part of its proposed landscaping. However, the All-Ireland Pollinator Plan advises against planting wildflower seed outside a garden setting. The Department agrees that wildflower seed mixes can be harmful to existing wildflower biodiversity and advises it should not be carried out in the case of this development.

To clarify, the following points are taken from the Position Paper by the Dublin Naturalists' Field Club entitled '*The case against 'Wildflower' seed mixtures*' which is endorsed by the All-Ireland Pollinator Plan and reproduced on their website



- Seeds of non-local origin – even if the species are native – introduce new genetic strains which may displace or compromise the local, naturally-occurring flora.
- Local, native species do not need to be sown. Native plants colonise suitable habitats by natural means.
- Seeds which are commercially produced and deliberately sown cannot, by definition, be wild and introducing them to the natural environment does not contribute to addressing biodiversity loss.
- The genetic integrity of what remains of our rare and ecologically significant native species is, therefore, threatened by the introduction of seed from external sources. Pollen from these geographical insertions and intrusions cannot be prevented from fertilising the local native stock of the same species or causing hybridisation with other closely related species.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [manager.dau@npws.gov.ie](mailto:manager.dau@npws.gov.ie), or to the following address:

The Manager  
Development Applications Unit (DAU)  
Government Offices  
Newtown Road  
Wexford  
Y35 AP90

Is mise, le meas

A handwritten signature in blue ink, appearing to read 'Julie Sullivan', is positioned above a horizontal line.

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Julie Sullivan  
Assistant Principal  
Development Applications Unit  
Administration