



Submission on Observations to Draft Railway Order Application

January 2025



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1. INTRODUCTION

1.1 Introduction

This Report provides a response to the submissions made to An Bord Pleanála (the Board) in relation to the DART+ Coastal North Project.

An overview of the submissions received is provided in Section 1.4 below. The issues raised in the submissions on the Proposed Development, together with responses thereto are provided in Sections 2 to 6.

There is a significant degree of overlap between many of the issues raised in submissions. Where the same issue is raised in a number of submissions, Section 2.2 of this report gives a summary response at a scheme-wide level, while Section 2.3 gives a summary response for location specific issues raised. Responses to the individual submissions are provided in Sections 3 through 6.

1.2 Legal provisions under Transport (Railway Infrastructure) Act, 2001 (as amended)

The Proposed Development is being progressed through the Railway Order process through an application for a Railway Order as required under the Transport (Railway Infrastructure) Act 2001 (“the 2001 Act”). The 2001 Act has been amended and substituted by a number of legislative provisions including by the Planning and Development (Strategic Infrastructure) Act 2006, the Dublin Transport Authority Act, 2008, the Public Transport Regulation Act, 2009 and was recently further amended by the European Union (Railway Orders) (Environmental Impact Assessment) (Amendment) Regulations 2021 (S.I. No. 743/2021) (“the 2021 Regulations”).

Section 37(3) of the 2001 Act provides that the Railway Order application shall be accompanied by a draft of the proposed order, a plan of the proposed works and a book of reference. The draft order anticipates scheduled agreements (including agreements with local authorities), scheduled conditions, modifications, restrictions and requirements, which are provided for in Section 43(2) of the 2001 Act. The section provides that the Board may make a railway order in such manner and subject to such conditions, modifications, restrictions and requirements (and on such other terms) as the Board thinks proper and specifies in the order.

Section 42(1) of the 2001 Act provides that the Board may, at its absolute discretion, hold an oral hearing into an application for a Railway Order. The conditions, modifications, restrictions and requirements which the Board may ultimately choose to apply to a Railway Order often arise during an oral hearing before the Board, and the assessment of appropriate conditions may necessitate consideration of further reports or supplementary reports. CIÉ would include detailed responses in individual précis of evidence or statements by its personnel, its consultant team and advisers as part of its submission to the oral hearing.

Section 43(1) provides that the Board shall, before deciding whether to grant a railway order, consider the following:

- (a) the application;
- (b) the draft order and documents that accompanied the application;
- (c) the report of an oral hearing held under section 42 and the recommendations (if any) contained therein;
- (d) any submission duly made to it under section 40(3) or 41(4) and not withdrawn;
- (e) any submission duly made to it by an authority referred to in section 40(1)(c) or (e);
- (f) any additional information furnished to it under section 41;
- (g) the likely consequences for proper planning and sustainable development in the area in which it is proposed to carry out the railway works and for the environment of such works; and
- (h) the matters referred to in section 143 (inserted by the Planning and Development (Strategic Infrastructure) Act 2006) of the Planning and Development Act, 2000.

The matters referred to section 143 of the Planning and Development Act, 2000 are as follows:

- (a) the policies and objectives for the time being of the Government, a State authority, the Minister, planning authorities and any other body which is a public authority whose functions have, or may have, a bearing on the proper planning and sustainable development of cities, towns or other areas, whether urban or rural,
- (b) the national interest and any effect the performance of the Board's functions may have on issues of strategic economic or social importance to the State, and
- (c) the National Planning Framework and any regional spatial and economic strategy for the time being in force.

1.3 The Railway Order Process

Land referencing and the compulsory acquisition process are incorporated into the Railway Order process. The Book of Reference and schedules thereto, for example, indicate the identity of the owners and of occupiers of the lands and those with interests in and over lands described in the plan of the proposed railway works. The 2001 Act also provides that the Railway Order is to have effect as if it were a compulsory purchase order referred to in section 10(1) of the Local Government (No. 2) Act, 1960 (inserted by section 86 of the Housing Act, 1966) and that section is to apply and have effect with certain prescribed modifications and with any other necessary modifications. In practice therefore, discussions with those persons who have interests in lands the subject of a draft Railway Order (as with any CPO) continue up to and including any oral hearing which may be directed by the Board. The draft Railway

Order provides for the attachment of a Schedule of Agreements which includes inter alia agreements with those persons who have interests in lands the subject of the draft Railway Order process. This submission is made, therefore, without prejudice to any agreements and/or arrangements which may be reached in the period after this submission is made.

1.4 Overview of Submissions Received

A total of 175 submissions were received and accepted by the Board and subsequently provided to the Applicant.

The submissions received in response to the Proposed Development as part of the statutory consultation process raise a number of issues, some of which can be attributed to common themes across the wider scheme. These issues are set out in Table 1 below.

Table 1 - Summary of Common Scheme Wide Themes identified from Submissions Received

Scheme Wide Issues Raised	
<ul style="list-style-type: none"> • Principle of development • Request for Oral Hearing • Observation cost • Inadequate time to review documentation • Insufficient communications • Call for additional stations • Calls for additional track capacity (particularly south of Howth Junction & Donaghmede Station) • Improvement of station amenities • Loss of vegetation • Property impacts/compensation • Condition surveys 	<ul style="list-style-type: none"> • Nuisance (control of rats & vermin) • Noise & Vibration • Air Quality / Dust • Electromagnetic Fields (EMF) • Health concerns • Biodiversity • Disruption to Roads, Traffic, Access and Parking during Construction • Impact on Intercity/Enterprise Trains • Issues with previous timetable changes • Long term planning in public transport strategies and land use planning • Issues with existing congestion and resilience of the Northern Line.

While these common themes were identified across the wider scheme, common themes attributed to specific geographic areas also emerged, in respect of the Howth Branch Line and the Malahide area in particular. These common themes are set out in Table 2 and Table 3 below.

Table 2 - Summary of Common Themes identified from Submissions in respect of the Howth Branch Line

Howth Branch Line – Main Issues Raised	
<ul style="list-style-type: none"> • Concern over removal of Direct Service • Need for interchange at Howth Junction & Donaghmede (Journey times / Journey Amenity / Journey Characteristics) • Impact on Level Crossings / Increased wait times / Increased traffic • Improvements / Optimisation of Level Crossings • Impact on climate policies / Sustainable transport goals • Accessibility and impact on those with a disability, the elderly, the vulnerable. • Emergency Services • Impact on Local Businesses • Inaccurate Survey Information relating to population growth in Howth • Access to Schools • Increased traffic due to people choosing to drive rather than interchange at HJ&D. 	<ul style="list-style-type: none"> • Impact on tourism • Security and anti-social behaviour concerns at Howth Junction & Donaghmede Station • Passenger capacity on receiving trains arriving from the north at Howth Junction & Donaghmede Station. • Concern around increased population in Howth • Need to consider alternatives • Lack of clarity of with Howth Shuttle • Concerns of people of Howth being taken into account • Impact on access across the railway at Claremont level crossing • Impact on legal right of way associated with Claremont level crossing • Impact on Emergency Services at Claremont Level Crossing • Potential for traffic impacts on Howth Road.

Table 3 - Summary of Common Themes identified from Submissions in respect of the Malahide Area

Malahide Area – Main Issues Raised	
<ul style="list-style-type: none"> • Impact on Landscape & Visual amenity • Noise and vibration • Traffic and Transportation 	<ul style="list-style-type: none"> • Human Health concerns • Re-consider alternative options.

2. RESPONSE TO SUBMISSIONS

2.1 Introduction

The issues raised in the submissions have been summarised so as to provide a more concise response document, as many of the submissions are quite lengthy in the detail provided.

Commonly raised issues (scheme wide and location specific as outlined in Section 1 above) are grouped in Section 2 with responses provided. These are broken down into scheme wide issues and those common issues raised in submissions from specific geographic areas, namely the Howth Branch Line and the Malahide Area.

In Sections 3 to 5, where we set out the responses to the individual submissions, we have ensured that we do not repeat the responses to those scheme wide or location specific common theme issues but instead refer to the responses provided in Section 2, to ensure against unnecessary repetition.

If it is the case that we have not responded to an issue raised in a submission, this should not be taken as an acceptance on the part of the Applicant of that issue, or anything set out in the submission, unless we have expressly stated such acceptance.

Section 3 deals with submissions from Planning Authorities.

Section 4 deals with submissions from Public and Prescribed Bodies

Section 5 deals with submissions from landowners with lands lying within the Project red line boundary extents.

Section 6 deals with other submissions, received from the general public and other bodies.

2.2 Scheme Wide Issues Raised

2.2.1 Principle of development

Many submissions recognise the benefits of improving public transport by means of the DART+ programme. However, the feedback on DART+ Coastal North is mixed between support and opposition to the Project in principle, with the bulk of opposition emanating from the Howth Peninsula locality. Many submissions note support for the Project in principle, while raising concerns relating to a variety of associated perceived issues. The concerns that follow in the submissions focus mainly on Project impacts relevant to the construction and operation phases.

2.2.2 Request for Oral Hearing

A number of respondents requested an oral hearing and to be informed of any date for a future oral hearing.

Response to issue raised

The Applicant notes that the decision on whether or not to hold an oral hearing is exclusively a matter for An Bord Pleanála to determine.

2.2.3 Observation Cost

A number of respondents queried the observation cost and queried why they are not entitled to make a free observation. Some also queried why there is no discount rate for pensioners.

Response to issue raised

The observation cost is outside the control of the Applicant and is part of the Railway Order application process (governed inter alia by the Transport (Railway Infrastructure) Act, 2001 (as amended) and the Planning and Development Act, 2000 (as amended)). The law provides that potentially impacted landowners who are referenced in the draft Railway Order are entitled to make an observation free of charge. Others must include a fee to make an observation. Neither the Applicant nor An Bord Pleanála has any flexibility on this point.

2.2.4 Inadequate time to read the documentation

Several submission-makers felt that they were not given sufficient time to read the documentation provided.

Response to issue raised

The timeframe relating to the An Bord Pleanála statutory consultation is governed by the Transport (Railway Infrastructure) Act 2001 (as amended), which sets a requirement for at least 6 weeks. This An Bord Pleanála statutory consultation was from July 19th until September 20th 2024 (8 weeks). The statutory consultation period was extended in a notice posted on 9th September 2024, to the 23rd October 2024 (6 weeks), given that additional information (regarding the pre-application consultation file) was being submitted to An Bord Pleanála and being made available for inspection by the public. This extension to the statutory consultation period was to allow the public time to view the additional information provided.

Throughout the statutory consultation phase the Project team was available and active in assisting people via the Project phone line and email service. This included property owners who sought assistance in reading/understanding their property pack during the statutory consultation period.

2.2.5 Insufficient communications

Concerns were raised in relation to the public consultation, stating that the level of communication between the Applicant and the public was unsatisfactory.

Response to issue raised

The Applicant has worked hard to communicate widely and clearly with the general public, throughout the Project development thus far, including two non-statutory public consultation periods, as described in the PC1 and PC2 Findings Report submitted with the Railway Order application.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route. The Project design evolved throughout the early design stage. This meant that additional potentially impacted landowners / occupiers were identified as the Project design progressed. The Applicant notified potentially impacted landowners / occupiers as soon as the need for land acquisition at their property was identified.

Property owners' names have been identified via Property Registration Authority of Ireland (PRAI) searches. In some cases, this data was found to be out-of-date or unavailable which is a matter outside the control of the Applicant.

The Project team has continued to update the property owner database where new information has become available in the course of the engagement process.

As part of the communication strategy, a Community Liaison Officer (CLO) has been available to engage with anyone seeking information relating to the DART+ Coastal North Project, and a CLO will be appointed and remain in place for the duration of the Project. The CLO will be in place to communicate with residents and impacted parties, and to address any concerns that may be raised in relation to the Project going forwards.

2.2.6 Calls for Additional Stations

Some respondents have queried the omission of additional stations within the scope of DART+ Coastal North. Potential station locations such as Drogheda North and Bettystown have been identified as localities/communities which are seen as potential benefactors of new stations in their areas due to growing populations in these areas.

Response to issue raised

The strategy for the provision of new stations and other rail infrastructure is a matter for the National Transport Authority (NTA).

The delivery of new stations is not included as part of the DART+ Coastal North Project and will, if required, be progressed by Iarnród Éireann as separate projects, subject to approval by the NTA.

The DART+ Coastal North Project does not preclude any future development of potential new stations, such as that proposed at Bettystown in the East Meath Local Area Plan, or another station in the North Drogheda area, along the Northern Line.

While no new stations are being provided under DART+ Coastal North, the Project will deliver some significant station enhancements at Howth Junction & Donaghmede Station. These significant modification works are proposed to both improve the passenger experience generally, and to develop the station to better serve as an interchange station into the future. The works will involve modifying the entrances to provide a more accessible, user friendly and customer focused station for all rail users, as well as improve the connection to the surrounding areas of Donaghmede and Kilbarrack. Upgrades will also take place to the footbridge and connections to the centre platforms, as well as the lighting, signage, and finishes throughout.

2.2.7 Calls for Additional Track Capacity (South of Howth Junction & Donaghmede)

A number of submissions called for an increase in track capacity between Dublin Connolly and Howth Junction & Donaghmede Stations to be included as part of DART+ Coastal North.

Response to issue raised

An aim of DART+ Coastal North has been to maximise the effectiveness of existing infrastructure in the delivery of the proposed DART capacity and frequency increases. The current proposals are based on double track between Dublin Connolly and Howth Junction & Donaghmede Stations.

However, preliminary assessments are underway as part of the Four North Project which is expanded upon in Section 2.2.21.

2.2.8 Improvement to Station Amenities (accessibility, public realm)

Issues were raised in relation to missed opportunities for the provision of station amenities such as provision of car parking and pedestrian and cycle facilities, and the need for upgrading the public realm around DART stations. Other submissions also raised issues with regard to the availability of lifts, toilet facilities, etc within stations.

Response to issue raised

Additional parking facilities at stations are not included as part of DART+ Coastal North's Project scope, which is focussed on the development of infrastructure to facilitate the increase in train frequency on both the Northern Line and Howth Branch. However, separately to the DART+ Coastal North Project and outside the Railway Order, Iarnród Éireann are progressing a number of projects including the Multimodal Interchange Project, DART Station Enhancement Project and Carparks Programme aimed at developing stations to support future needs.

The Multimodal Interchange Project will assess all stations throughout the network with a view of implementing its strategy at stations where there is need for modifications that will have an impact on multimodal travel and station access. The Project will assess a variety of multimodal

options at stations including but not limited to the provision of secure bicycle parking and shared mobility services.

Additionally, the DART Station Enhancements Project will review the future requirements at DART stations and make proposals for future projects.

The provision of strategic Park & Ride facilities, car parking and pedestrian and cycle facilities are included in NTA's construction portfolio. However, the provision of Park & Ride facilities at or near certain stations is not part of the DART+ Programme.

In respect of the availability of lifts, toilet facilities, etc the maintenance and upkeep of existing stations is an important element of Iarnród Éireann's ongoing works. Maintenance of station cleanliness, lighting and signage is ongoing and the proposed upgrades at Howth Junction & Donaghmede Station will include the provision of adequate shelter as well as upgrades to lighting, signage and finishes throughout.

Toilet facilities are provided at Connolly & Pearse Stations, in Dublin City Centre. Ongoing issues with anti-social behaviour and vandalism have led to the closure of toilet facilities at stations elsewhere along the DART+ Coastal North route. The provision of toilets at both Connolly & Pearse Stations is considered sufficient for the short-haul nature of DART trips which typically have a duration of less than 1hr (Greystones to Pearse, duration of approximately 52 mins).

The maintenance of, and accessibility to, both toilet and lift facilities at stations is managed by Iarnród Éireann's accessibility group and the management and maintenance of these facilities is an ongoing process that is operated separately to the DART+ Programme. The provision of facilities such as eateries at stations is not something that falls within the scope of DART+ Coastal North.

2.2.9 Loss of Vegetation

Concerns were raised in relation to the loss of trees and vegetation along the Project route, the visual impact of tree removal and the potential for replacement planting.

Response to issue raised

The Applicant acknowledges that there will be a loss of some vegetation to facilitate the Project and aims to minimise this impact where possible.

The design development had a focus ensuring vegetation removal was kept to the minimum necessary to accommodate the scheme. Chapter 8 Biodiversity in Volume 2 of the EIAR, documents the comprehensive assessment that was undertaken with regard to the potential effects of the Proposed Development on biodiversity, including habitats such as trees and vegetation. Where necessary, mitigation measures have been set out, including replanting.

A Landscape and Visual Amenity assessment has also been prepared and is included in Chapter 15 of Volume 2 of the EIAR. Planting mitigation and vegetation to be retained is shown in the landscape mitigation drawings, Volume 4, Appendix 15.3 of the EIAR (Drawing No. D+WP56-ARP-P3-NL-DR-EVLA-001001 to D+WP56-ARP-P3-NL-DR-EVLA-001009).

In terms of scope for replanting, proposed planting has had regard for engineering and safety requirements and includes separation distances from the OHLE on the electrified railway. There are some locations along the Project route where there is no scope for replacement planting, but every effort has been made to mitigate against loss of vegetation to planting elsewhere where possible.

A biodiversity enhancement area has also been included in the DART+ Coastal North Project, in an area of land just north of Malahide viaduct.

2.2.10 Property Impacts/Compensation

A number of respondents raised concerns regarding the impacts on their properties and associated compensations for any damage to property, or potential loss of property value, resulting from the DART+ Coastal North Project.

Response to issue raised

The DART+ Coastal North Project is in general, located along an existing rail line, with much of the infrastructural works proposed within the existing railway corridor. Where works are required outside the railway corridor, in third party lands, the design development has had regard to the proximity of property in the vicinity.

Notwithstanding, Chapter 14 Noise and Vibration of the EIAR assessed the likely significant vibration effects of the proposed DART+ Coastal North on the receiving environment.

As detailed therein, no adverse structural impacts are anticipated from the construction works as the vibration from construction activities is below the guide values for cosmetic damage. However, vibration from some construction activities may be perceptible at some residences.

During the construction phase, a noise and vibration monitoring programme will be implemented by the appointed contractor to assess compliance of the construction works with the noise and vibration limits as set out in Section 14.6.1.2 of the EIAR. The selection of monitoring locations (number and location) in consultation with the relevant local authorities but will be based on the nearest representative noise and vibration sensitive locations to the working areas which will progress along the length of the Proposed Development.

Full details of the Contractor's provision for noise and vibration monitoring and procedures including provisions for publication of monitoring results will be submitted to and agreed by the Planning Authority prior to commencement of work.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase Order (CPO) practice and procedure, if and when statutory notices are served, i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-ordersand-compensation/>.

The Applicant cannot comment on the effects on individual future property values. The delivery of DART+ Coastal North will provide an improved rail service on the Northern Line, providing a more frequent and reliable link between communities and Dublin City Centre and contributing to the growth of sustainable communities. Overall, there should be a positive benefit to those living within the areas serviced by the Northern Line.

2.2.11 Condition Surveys

Respondents requested that property condition surveys be made available to residents before construction commences.

Response to issue raised

No adverse structural impacts to third party properties are anticipated as a result of the DART+ Coastal North works, as detailed in the response to Section 2.2.10 above. Where appropriate, a condition survey will be carried out before any construction works commence which will be used to assess if any deterioration has occurred. Further details are included in Chapter 17 Material Assets – Non-agricultural Properties of the EIAR.

2.2.12 Nuisance (Control of Rats & Vermin)

Concerns have been raised in a number of submissions regarding the infestation of rats and vermin during the construction phase. It is stated that construction works on the railway have in the past led to problems.

Response to issue raised

A Construction Environmental Management Plan (CEMP) has been prepared as part of the Railway Order application and is included as Appendix A5.1 to the EIAR. The CEMP will inform the construction phase on site, and as a part of the CEMP, the Contractor will have responsibility for prevention and management of pests and vermin.

The Applicant will ensure that effective communications channels between the community and the Project team are maintained throughout the Project, so that any concerns raised can be responded to.

As part of the construction strategy, a Community Liaison Officer (CLO) will be appointed for the duration of the DART+ Coastal North Project. The CLO will be in place to communicate with the residents and to address any concerns raised by residents during the construction phase. The CLO will carry out communications activities, such as:

- to provide information to local residents about progress of the Project,
- to explain control measures being put in place,
- to inform the local community about works likely to cause disturbance and/or works planned to take place outside of core working hours.
- to discuss mitigations regarding the above issues.

The CLO will be available at all times during the construction phase if any issues arise.

2.2.13 Noise & Vibration

A number of the submissions had concerns in relation to noise issues. The issues ranged from concerns about the construction noise, night-time works, long term operational noise and vibration, and noise mitigation measures.

Response to Issues Raised.

Chapter 14 of the EIAR assesses the likely significant noise and vibration effects of the proposed DART+ Coastal North Project.

Note: Where location specific concerns are identified in a submission these are addressed within the specific response to the concerns raised. General responses to Noise and Vibration related queries are provided below.

1. Operational Noise

Details of the predicted noise effects from the operational phase of the Proposed Development are presented in Section 14.5.2 of the EIAR.

The metric used in noise assessments is L_{Aeq} , a weighted equivalent sound energy over a time period. The L_{Aeq} metric includes both the sound level and the duration of the sound in order to account for the intermittent nature of rail noise.

The assessment looked at potential noise impacts from the trains, as well as railway maintenance operations and depot operations. The assessment also predicted the potential effects from operation of the substations and ancillary infrastructure and any potential indirect effects. Where necessary, mitigation measures were proposed as detailed in Section 14.6.2.

As detailed in Section 14.5.2 of the EIAR, in respect of noise impacts from the train operations (following implementation of the Proposed Development), both residential and non-residential receptors within the study area are predicted to experience negligible, or minor adverse impacts. There are no receptors where a moderate or major adverse impact has been

predicted. In line with the proposed methodology, it is therefore concluded that noise impacts upon residential and non-residential receptors from train operations are assessed as not significant.

Section 14.7.2 sets out the residual effects in respect of noise for the operational phase of the Proposed Development and concludes that there are no significant residual effects from the Proposed Development.

2. Construction Noise

A detailed description of the proposed construction works, and phasing is outlined in Chapter 5 Construction Strategy of the EIAR.

It is acknowledged that short-term increases in noise impacts in certain areas will occur during the construction phase of the Proposed Development due to the requirement to use heavy plant and machinery. Section 14.6.1 of the EIAR identifies general mitigation measures that will be implemented during construction works. The extent and nature of the construction noise impacts is dependent on activity (for example site clearance, piling) and proximity to noise sensitive locations. The predicted noise impact from the construction activities was assessed against the thresholds of significance for construction noise. A list of activity-specific measures to mitigate the construction noise impacts if the threshold values are exceeded are outlined in Section 14.6.1 of Chapter 14 of the EIAR. By applying these mitigation measures the impacts of construction noise will be managed. There will also be ongoing community liaison channels in place during construction to respond to any specific concerns that arise.

3. Night-time works

Due to the importance of the Northern Line to commuters, it is intended that it will remain operational throughout the construction phase. Where possible works will be undertaken in safe zones during daytime periods. In certain circumstances full possession of the railway (i.e. no trains running) will be required and these will typically take place during weekend and night-time possessions.

When night-time works are required, they will be undertaken in accordance with the mitigation measures included in the EIAR, which aim to reduce impacts as much as possible. A Noise Management Plan will be developed as part of the construction stage of the Project. The Applicant will ensure residents living near the rail line are informed of upcoming works and given advance notice of any disruptive works.

If An Bord Pleanála decides to grant a railway order, the construction programme will be further developed including any changes/improvements in any construction methods/technologies to reduce noise. The need for any additional noise management measures will then be determined and incorporated into the final Project design.

As part of the construction strategy, a Community Liaison Officer (CLO) will be appointed for the duration of the Project. The CLO will be in place to communicate with the residents and to

address any concerns raised by residents during the construction phase. The CLO will carry out communications activities, such as:

- to provide information to local residents about progress of the Project,
- to share noise and vibration monitoring results and explain noise mitigation measures being put in place,
- to inform the local community about works likely to cause significant noise or vibration and/or works planned to take place outside of core working hours,
- to inform of mitigations regarding the above issues.

4. Operational Vibration

The operational vibration levels are influenced by the number of intermittent events, such as trains passing. The operational vibration was calculated and compared with the guideline levels for daytime and night-time periods. The results are presented in Section 14.5.2.5 in Chapter 14 of the EIAR. It was determined that no significant vibration arises from the Proposed Development during the operational phase.

2.2.14 Air Quality/Dust

A number of submissions have raised issues in relation to the impacts of the Proposed Development on air quality, specifically in relation to dust impacts.

Response to issue raised

Chapter 12 Air Quality of the EIAR has assessed the likely significant effects of the DART+ Coastal North Project on Air Quality, including dust impacts. As detailed therein, the greatest potential impact on air quality during the construction phase (see Section 12.5.1.2 of the EIAR) *“is from construction dust emissions, PM₁₀ and PM_{2.5} emissions and the potential for nuisance dust”* and the main dust generating sources or activities include vegetation clearance, demolition, construction traffic along public roads and material stockpiling.

A number of mitigation measures are proposed in Section 12.6.1 of the EIAR, in Appendix 12.1 Dust Mitigation Measures and are also included in the CEMP, see Appendix A5.1 of the EIAR. These measures include the preparation of an air quality management plan to be prepared by the contractor and submitted for approval to the relevant planning authorities, prior to the commencement of works and monitoring of dust deposition at sensitive receptors throughout the construction phase. With the implementation of these measures, as documented in Section 12.8.1 of the EIAR, *“no significant adverse impacts are likely to arise during the Construction Phase.”*

With respect to operational air quality impacts, it is clear that the new DART trains will be electric multiple units, and the assessment concluded that in accordance with the EPA Guidelines (EPA 2022) the likely effects associated with the Operational Phase rail traffic emissions are overall neutral and long-term.

Furthermore, Chapter 23 Human Health of the EIAR assesses impacts to health as a result of changes to air quality during construction and operation of the Project. As detailed in Section 23.5.1.3.2 of the EIAR, *“in simple terms while dust emissions could and probably would be significant in the absence of the described mitigation, it is not likely to be significant with the proposed mitigation”* and as per Section 23.5.1.4.1 no receptors will be significantly adversely impacts by air quality from the operational aspects of the scheme.

2.2.15 Electromagnetic Fields (EMF)

Some submissions raised concerns regarding the impacts associated with EMF and stray current and health effects.

Response to issue raised

EMF has been addressed in Chapter 22 Electromagnetic Compatibility and Stray Current of the EIAR. Recommended EMF exposure limits are in place at a European level to protect the public and workers from exposure to high EMF levels. The European Commission has adopted limits for exposure of the public and occupational exposure within EU Recommendation 1999/519/EC. This EC Recommendation is based on guidelines by the International Commission on Non-Ionising Radiation Protection (ICNIRP). The Project has been designed to ensure that public exposure to EMF complies with the recommended guidelines. A study of the DC magnetic fields levels that are expected to be generated around the operational railway has been undertaken using recognised modelling techniques. The predicted worst-case EMF levels were compared to public exposure limits and equipment immunity levels. Section 22.5 of the chapter provides details of the potential impacts of EMF. Based on the assessments, it is considered that EMF from the Project will not cause any health concerns. The Project will adhere to the relevant best practice guidelines outlined in Chapter 22 of the EIAR.

Chapter 23 Human Health of the EIAR assesses the impact of EMF on Human Health, in Section 23.8.6. No impacts on human health from EMF are envisaged during the Construction Phase or Operational Phase of the Proposed Development.

2.2.16 Health Concerns

A number of submissions raised issues in relation to health concerns such as night-time noise impacts for example sleep disturbance, effects on mental health, air quality health concerns and general quality of life concerns.

Response to issue raised

A detailed assessment of the potential impacts of the proposed DART+ Coastal North Project on human health was undertaken and is documented in Chapter 23 Human Health of the EIAR. This assessment was undertaken in accordance with best practice guidance and standards, as detailed in Section 23.2 and 23.3 of the EIAR.

As detailed in Section 23.5 of the EIAR, *“in terms of human health protection, emissions during the Construction or Operational Phase of the Proposed Development need to be identified and compared against reliable Health Based Standards. As detailed herein, reliable sources of the standards may be regulatory such as the EU, such as Air Quality Standards, or based on expert opinion such as is provided by the WHO as is the case with noise guidelines.”*

The human health impact assessment included consideration of a number of factors, including air quality, noise and vibration, the hydrological and hydrogeological environment (including flood risk and drinking water), land and soils (including contaminated land), electromagnetic effects and stray current, as well as psychological effects, impacts on physical activity, socioeconomics effects on health and access to services. The impact assessment in this regard takes account of the mitigation measures set out in other chapters of the EIAR and assesses the residual effects of human health impacts as set out in Section 23.8 of the EIAR.

In particular with respect to the construction phase of the Project, Section 23.8 notes that in respect of air quality that *“as outlined in Chapter 12, emissions to air during the construction activity will occur, as with any construction activity. These will be most noticeable very close to the construction activity. It is likely that this will cause some degree of annoyance. Some emissions will also occur from construction traffic. An extensive mitigation plan however is outlined, and this will ensure that no Air Quality Standards will be exceeded. These are health-based standards and in keeping with the methodology outlined above, this means that there will be no significant human health effects.”*

In respect of noise, the assessment notes that *“as outlined in Chapter, 14 Noise and Vibration, emissions from the construction activity will occur, as with any construction activity. These will be most noticeable very close to the construction activity. It is likely that these will cause some degree of annoyance. Some noise and vibration emissions will also occur from construction traffic. An extensive mitigation plan however is outlined, and this will ensure that these effects are minimised and so there will be no significant human health effects.”*

The potential psychological impacts were also assessed. The assessment includes the following in this regard (Section 23.8.7): *“Human beings may experience annoyance from the temporary effects of the Construction Phase, such as noise or dust as a nuisance. Annoyance is not in itself a health effect, although it is recognised that there can be potential impacts on a person’s overall psychological well-being. If someone develops a psychological illness such as anxiety or depression this becomes a medical impact. In terms of assessing the psychological impact, an impact is assessed as either positive or negative, if it is likely that the overwhelming majority of people will experience that effect. Where different psychological impacts are anticipated from the same scenario the assessed psychological impact is neutral.”*

The conclusions of the assessment are summarised in Section 23.9. In terms of the construction phase, the assessment notes that *“with the implementation of the mitigation measures proposed in Chapter 27 (Summary of Mitigation and Monitoring Measures) of this EIAR, no significant residual human health effects are predicted during the Construction Phase.”*

In respect of the operational phase, the assessment notes that, *“the impacts on human health during the Operational Phase are positive. It brings a modern and sustainable means a public transport to Dublin City, Fingal and Counties Meath and Louth, which will be used by the residents and visitors. It will be used as a means to travel to and from work, school, college and recreational activities. It also enhances access to services including health services. No significant residual human health adverse effects are predicted during the Operational Phase.*

Through a combination of benefits including socio-economic benefits, access to services, access to exercise and potential psychological benefits, an overall positive impact on human health is predicted.”

2.2.17 Biodiversity

A number of submissions raised issues in relation to disturbance/ harm to wildlife, biodiversity loss, conservation plans and mitigation measures for these issues. The specific issues raised are addressed within the individual submission responses in Sections 3 to 5 herein.

2.2.18 Disruption to Roads, Traffic, Access and Parking during Construction

Some of the submissions have raised concerns regarding disruptions, road diversions and increased traffic during the construction phase and these are addressed within the individual submission responses.

2.2.19 Impact on Intercity/Enterprise Trains

A number of submissions raise concern that an increased frequency of suburban DART services will negatively impact on Intercity/Enterprise trains from Belfast/Dundalk/Drogheda. The submissions note that journey times for the Enterprise Service from Belfast are expected to increase as a result of the increased frequency of DART services and note that journey times for the Enterprise have not been quantified in the DART+ Coastal North assessments.

Response to issue raised

The Applicant acknowledges that the extension of the DART network to Drogheda and the proposed increase in DART frequency operating on the Northern Line will have an impact on journey times of other Enterprise services. Between Dublin Connolly and Drogheda MacBride, the Intercity and Enterprise services will share the Northern Line with DART services.

The future Enterprise journey times have not been quantified in the DART+ Coastal North assessments as they will be dependent on future timetables. Actual journey times, and timetables, for DART services originating from Drogheda, Malahide, Clongriffin and Howth, have yet to be determined. These will vary depending on operational decisions and priorities at that time, of which there are many variations and options to consider. Any substantial timetable change will go through a public consultation process of its own organised by the NTA known as the Timetable Customer Consultation Process.

Separately to the proposals within the DART+ Coastal North Project Railway Order application, Iarnród Éireann are continuing to work on and develop complimentary measures seeking to improve performance and reliability for all services on the Northern Line. These complimentary measures include general upgrades to tracks and signalling, the potential introduction of additional passing loops, and consideration of 4-tracking between Malahide and Dublin City Centre as part of the Four North Project.

2.2.20 Issues with previous timetable changes

A number of submissions have noted concern with the DART+ Coastal North proposals for future increases in DART services frequency and capacity, citing issues experienced with past timetable changes introduced by Iarnród Éireann which resulted in reliability issues and subsequently required further revisions.

Response to issue raised

Reliability issues with Enterprise Services are not solely timetable related but can also be attributed to capacity issues experienced at Dublin Connolly, which will be addressed as part of the DART+ West Project. The age and performance levels of the current rolling stock utilised by Enterprise services have also contributed to deteriorating reliability of services. A project is currently underway to replace the existing fleet. An order is expected to be placed by end of 2025 and the new fleet is expected to be in service by 2030. These infrastructural interventions and rolling stock upgrades will greatly improve the performance of this service upon delivery.

With regards to the timetable introduced by Iarnród Éireann in August 2024, it is now clear with hindsight that the timetable introduced was overly ambitious. The objective of the timetable revision was to reduce journey time and add extra service slots to provide an hourly Belfast-Dublin service. The timetable did not allow for sufficient dwell times at stations and it compounded delays through Dublin Connolly. Amendments have now been made, and the performance and punctuality has improved. Further amendments are in development which will result in a higher degree of performance and punctuality. The reconfiguration at Connolly that is part of DART+ West will allow for greater operational flexibility at Connolly, which again will further improve service performance, punctuality and timetable reliability through Dublin City Centre.

With regards to the concerns raised in the submission with a lack of resilience on the Northern Line, the infrastructural interventions (turnback facilities at Drogheda, Malahide, Clongriffin, and Howth Junction & Donaghmede Station) proposed by DART+ Coastal North will greatly improve the operational flexibility and overall resilience on the Northern Line.

2.2.21 Long-term Planning in public transport strategies and land use planning

A number of submissions have called for the DART+ Coastal North Project to include provisions to future proof the Northern Line through longer-term planning. Submissions requested that the provision of four-tracking on the Malahide/Connolly line, or similar

upgrades, should be included in current public transport strategies and land use planning to support Ireland's climate change objectives.

Response to issue raised

The development of public transport strategies and land use planning are a matter for the NTA, the Department of Transport, and Local Authorities and cannot be commented upon by the Applicant as part of this Railway Order application.

The Applicant acknowledges that the existing twin-track system between Connolly and Malahide is shared by both commuter and intercity trains which can lead to potential congestion and delay issues, particularly during peak times.

The route capacity between Dublin Connolly and Malahide is limited to 12 trains per hour per direction in the Train Service Specification (TSS1C¹). When considering IE's ability to deliver maximum frequency and capacity on the infrastructure, it has been necessary to consider the operation of both through DART services from Howth, as well as a shuttle service on the Howth Branch. The proposals of DART+ Coastal North are based on the existing twin-track between Malahide and Dublin Connolly remaining as twin track, however, the proposals will not impact on any future plans that may be developed to increase capacity on this section of the Northern Line into the future.

Potential 4-tracking of the Northern Line between Malahide and Dublin Connolly is expanded upon in Section 2.2.22 below.

2.2.22 Issues with existing congestion and resilience of the Northern Line (calls for further interventions)

Submissions have proposed that additional interventions to those that are included as part of DART+ Coastal North should be included in the Project, to address perceived existing issues with congestion and resilience of the Northern Line. Calls for an increase in the number of tracks from 2 to 4 between Connolly and Malahide, with provision for 4 tracks to Drogheda included in public transport policies and land use planning have been proposed in submissions.

Calls for additional passing loops at locations such as Skerries, Mosney, Gormanston, Malahide and between Dublin Connolly and Howth Junction have also been proposed.

Response to issue raised

1. 4-tracking of the Northern Line

¹ The Train Service Specification (TSS), is the 'desired' number of train services to have on each branch of the DART network (i.e. trains per hour per direction [TPHPD]). This DART+ Coastal North Project adopts version TSS1C.

Iarnród Éireann is currently, separately to DART+ Coastal North, assessing the possibility of introducing sections of four-tracking between Dublin Connolly and Malahide, as part of the 'Four North Project'. A new four-track system would allow for a complete separation between intercity services and DART services, similar to the existing four-track setup on the approaches to Heuston Station. The ambitions of the Four North Project are also included in the All-Island Strategic Rail Review, which was jointly commissioned by the Department of Transport in Ireland and the Department for Infrastructure in Northern Ireland and sets out a strategic vision for the development of the rail system across the island of Ireland over the coming decades. The Rail Review Report sets out 32 strategic recommendations to enhance the rail system in Ireland and Northern Ireland up to 2050, aligning with net carbon zero commitments in both jurisdictions. The recommendations seek to transform the quality of the rail system to the benefit of passengers and wider society on the island, involving additional track capacity, electrification, increased speeds, higher service frequencies and new routes. It is the objective of Iarnród Éireann that four tracking between Connolly and Malahide would be complete by 2040. The Four North Project is currently at feasibility stage and this timeline is subject to planning and funding allocation.

2. Provision of additional passing loops as part of DART+ Coastal North

The Applicant acknowledges the potential benefits of introducing additional passing loops in addition to the interventions currently proposed by DART+ Coastal North.

However, in order to deliver the service requirements of TSS1C, it is not considered necessary to introduce infrastructure beyond those passing loops proposed by the Railway Order application at this time. The turnbacks proposed at Drogheda, Malahide, Clongriffin and Howth Junction and Donaghmede Stations will allow for the service frequencies proposed by TSS1C to be delivered and will also improve the overall resilience of the existing rail network.

Going forwards, Iarnród Éireann does not rule out the development of passing loops such as those proposed in the submission as part of future projects, should a need for such infrastructure be identified.

2.3 Location Specific Issues

Further to those scheme-wide issues raised above, a large number of submissions raised concerns that are specifically related to more localised issues along the Northern Line and Howth Branch. In particular, common themes were identified with regard to the Howth Branch and the Malahide area. These are addressed below.

2.3.1 Howth Branch

By far the largest number of submissions received as part of the statutory consultation focussed on the impact of the DART+ Coastal North Project on the Howth Branch. The most prominent issues raised in submissions relevant to the Howth Branch are set out below, while other more submission-specific issues are responded to within each individual submission response, see Sections 3 to 6.

2.3.1.1 Concern over removal of direct service / Lack of Direct Service

A high volume of submissions raised concern and strong objection to the removal of/lack of a direct service between Howth and Dublin City Centre.

Response to Issue Raised

It should be noted that the DART+ Coastal North Project proposals will result in a greatly enhanced level of service on both the Northern Line and Howth Branch. The primary objective of the DART+ Coastal North Project is to deliver the infrastructure required to enable this. As detailed within the Railway Order application, (see in particular Chapter 4 Description of the Proposed Development in the EIAR), the DART+ Coastal North Project will, if consent is granted, *“deliver an improved and extended electrified rail network and will enable increased passenger capacity and an enhanced train service between Dublin City Centre and Drogheda, including the Howth Branch.”*

To support this objective, the Proposed Development will seek a reconfiguration of Howth Junction & Donaghmede Station and the removal of train crossing conflicts at the station. These conflicts currently limit Iarnród Éireann’s ability to increase capacity and enhance services on the Northern Line and Howth Branch. As detailed in Section 4.11.1 of Chapter 4 of the EIAR, *“Proposed changes to the Howth Branch . . . would enable a direct line service between Howth and Dublin City Centre and/or a DART shuttle service between Howth Junction and Donaghmede and Howth Stations”*.

The Applicant would like to make clear that the enhancement of the service on the Howth Branch will include a combination of a direct service to the city centre and a DART shuttle service between Howth and Howth Junction & Donaghmede Station.

However, the capacity of the Northern Line (south of Howth Junction) into Connolly Station is 12 trains per hour, and these 12 trains per hour need to be shared between the Howth Branch and the Northern Line. In order to increase train frequency to 12 trains per hour on the Northern Line north of Howth Junction, it will eventually be necessary to run a DART shuttle service on the Howth Branch.

The Project also proposes to significantly enhance the service on the Howth Branch from 3 trains per hour to 6 trains per hour during peak periods. This allows for the capacity and frequency of DART+ services on both the Northern Line and Howth Branch to be maximised.

When future passenger demand warrants the operation of a DART Shuttle Service on the Howth Branch, passengers travelling to/from Dublin City Centre will be required to interchange between services at Howth Junction and Donaghmede Station.

The Applicant has been clear throughout the non-statutory public consultation process and in the application documentation that while the Proposed Development seeks to make the infrastructural changes which would enable these operational changes, the implementation of these operational changes is not part of the DART+ Coastal North Project.

It is important to note that the operation of a DART shuttle service is not something that would come into effect immediately upon the delivery of the DART+ Coastal North Project. Following completion of the Project, there will be different phases of timetable development that will be gradually introduced as the passenger demand grows towards the maximum level of service. It is also envisaged that shuttle services would operate at peak times with direct services being maintained at off-peak and weekends.

Once DART+ Coastal North is complete (if consented) and as demand increases, the operational detail will be worked through, with these operational changes likely made on a phased basis.

Any substantial timetable change, such as the introduction of a shuttle service, will go through a Public Consultation process of its own organised by the National Transport Authority (NTA) known as the Timetable Customer Consultation Process.

2.3.1.2 Need for Interchange - Journey times / Journey Amenity/Journey Characteristics

A large number of submissions raised concern about the need to interchange at Howth Junction & Donaghmede Station, particularly in respect of increases in journey times, journey amenity and journey characteristics.

Response to Issue Raised

As detailed in the response in Section 2.3.1.1 above, when future passenger demand warrants the operation of a DART Shuttle Service on the Howth Branch, passengers travelling to/from Dublin City Centre will be required to interchange between services at Howth Junction & Donaghmede Station.

The DART+ Coastal North Project will also however, enable an increased frequency of service on the Howth Branch, up from the current three services an hour to a maximum of six services an hour during peak periods. This provides much more flexibility to passengers in their journey planning both to and from the city centre. This is all detailed in Chapter 4 Description of the Proposed Development of the EIAR, with Section 4.11.1.1 confirming that “*Any future DART shuttle service on the Howth Branch would also enable improvements in the reliability of timetabling, as trains operating on this branch would no longer be susceptible to delays occurring along the Northern Line*”.

The Applicant would like to provide further clarity as to how the interchange would likely operate under a number of scenarios, when compared to the current situation. As noted in the response under Section 2.3.1.1, following completion of the Project, there will be different phases of timetable development that will be gradually introduced as the passenger demand grows towards the maximum level of service. Once DART+ Coastal North is complete (if consented) and as demand increases, the operational detail will be worked through, with these operational changes likely made on a phased basis and subject to public consultation through the Timetable Customer Consultation Process.

We have set out a number of scenarios below to better illustrate how the interchange would work and the potential journey times, noting that these are estimates and subject to future timetable development.

1. Howth to Connolly

The proposed journey time (during peak hours) between Howth and Connolly including the interchange would range between 27-36 minutes, with a median of 31 minutes depending on how the timetable is structured. This is in comparison to the current journey time of 25 minutes. Passengers can expect an additional journey time of approx. 6 minutes at peak times, noting however, that services will run from Howth Junction every 10 minutes in comparison to every 20 minutes today. The interchange would be required across the central platform 2/3 as shown in the figure below providing for an easy cross-platform interchange.

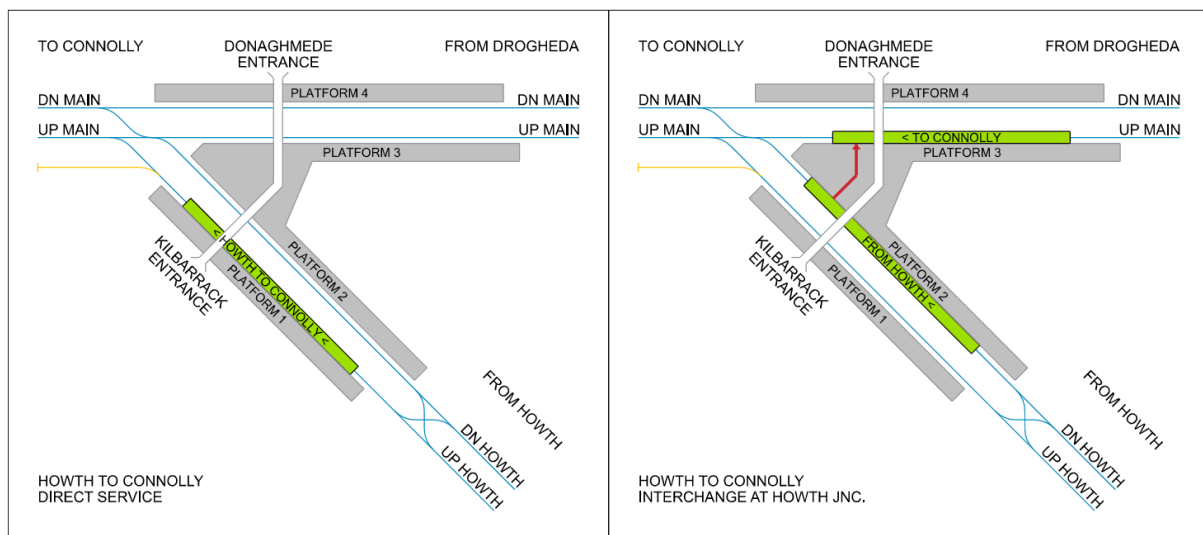


Figure 1 - Schematic showing train/passenger movements (Howth to Connolly) for direct and shuttle (interchange) service at Howth Junction & Donaghmede Station

2. Connolly to Howth

The proposed journey time (during peak periods) between Connolly and Howth would range between 29-38 minutes, with a median of 32 minutes depending on how the timetable is structured. This is in comparison to the current journey time of 25 minutes. Passengers can expect an additional journey time of approximately 7 minutes at peak times, noting however, that services will run from Howth to Howth Junction every 10 minutes in comparison to every 20 minutes today. Those interchanging would be required to use the footbridge from platform 4 to the central platform 2/3 as shown in the figure below.

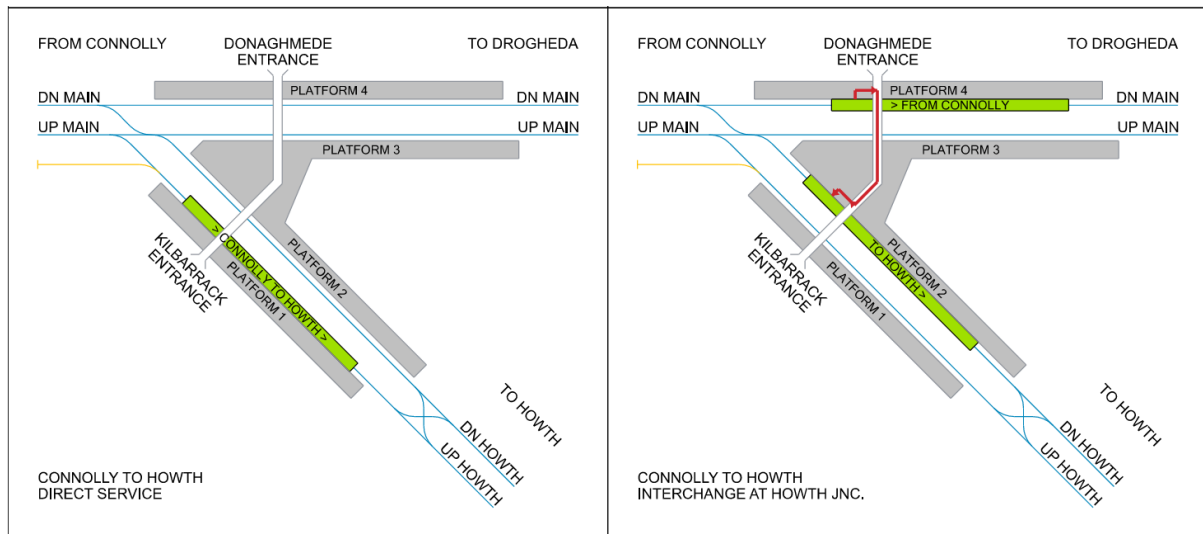


Figure 2 – Schematic showing train/passenger movements (Connolly to Howth) for direct and shuttle (interchange) service at Howth Junction & Donaghmede Station

3. Howth to Drogheda/Drogheda to Howth

In the scenario of northbound (to/from Drogheda) passengers, the proposed interchange would be improved compared with the current arrangements today. Passengers from Howth to Drogheda would have less distance to travel along the footbridge, while passengers from Drogheda to Howth only need to cross the central platform 2/3, Refer to figures below.

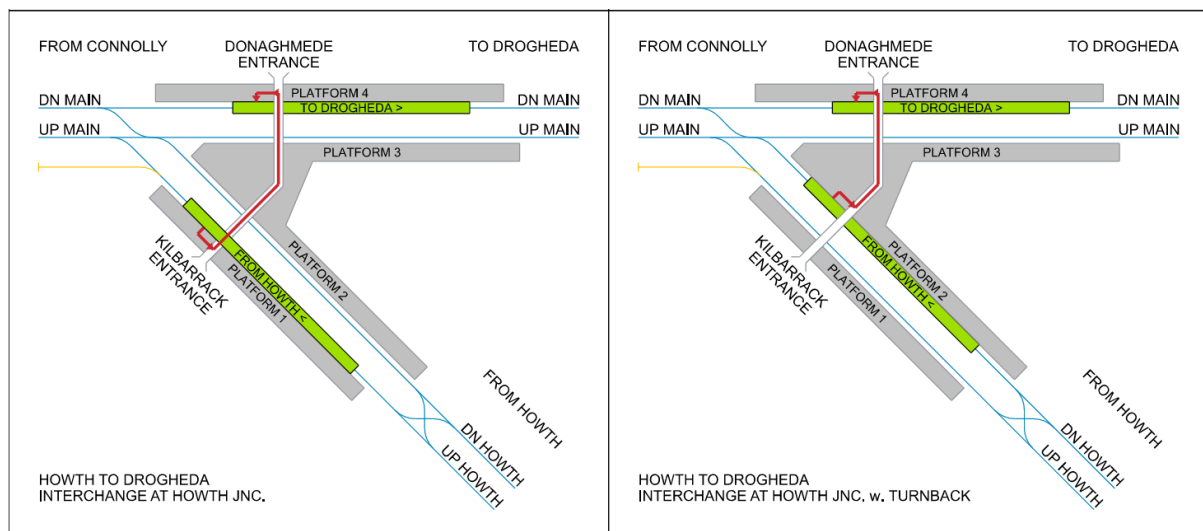


Figure 3 - Schematic showing train/passenger movements (Howth to Drogheda) for direct and shuttle (interchange) service at Howth Junction & Donaghmede Station

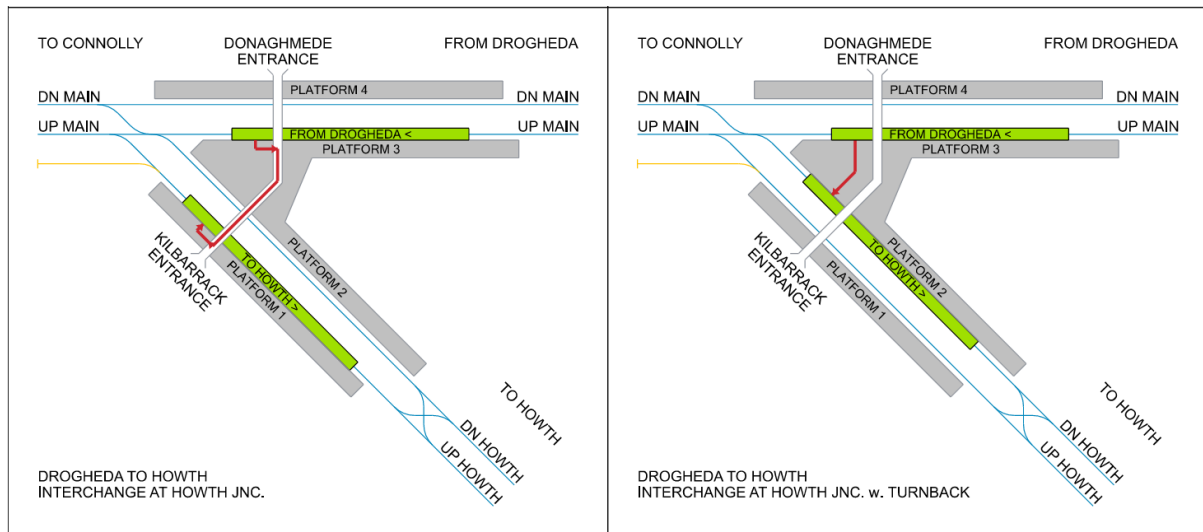


Figure 4 - Schematic showing train/passenger movements (Drogheda to Howth) for direct and shuttle (interchange) service at Howth Junction & Donaghmede Station

While the future timetable will determine overall journey times, it is envisaged that the more frequent service and the overall improved reliability of service, will ensure any impacts are minimised.

Section 2.3.1.6 below also details the proposed upgrades to the Howth Junction & Donaghmede Station which will both improve the passenger experience generally and develop the station to better serve as an interchange station into the future. This includes for example (and addressing specific concerns raised in some of the submissions) the provision of additional shelter on the platforms for those who might be interchanging in the future.

Chapter 7 Population of the EIAR has assessed the journey characteristics and journey amenity for those utilising the Howth Branch and concludes the following (Section 7.5.4.2): *"In summary, by being less dependent on the connection with the Northern Line, the proposed shuttle service will be able to keep to a more independent, regular and reliable timetable. In these circumstances it will be possible to accommodate the more frequent services. This represents a significant positive impact for the journey characteristics of people living and visiting Howth, while the extension of the platform at Howth and Donaghmede Station will cause the net journey amenity effects of changing from the proposed DART shuttle to the mainline service to be neutral"*.

As noted in other responses, it is also noted that the proposed DART+ Coastal North Project will provide the infrastructure which will enable this increased frequency of service. The implementation of these operational changes will be done over time and in response to increasing demand. Any such changes, including the introduction of a DART shuttle service on the Howth Branch, will be subject to public consultation by the NTA, (known as the Timetable Customer Consultation Process) prior to implementation, where any concerns of the public to the proposed timetable changes can be raised.

2.3.1.3 *Impact on Level Crossings/ Increased wait times/Increased Traffic*

A high volume of submissions raised concern about the potential effects of the Proposed Development on level crossings on the Howth Branch and associated increased wait times at these level crossings (for road traffic), which would result from the increased frequency of service (3 trains per hour to 6 trains per hour during peak periods).

Many of these submissions also raised concern about the associated increase in traffic on the surrounding road network and the potential impact of increased queuing on air quality in the surrounding environment.

Response to Issue Raised

As detailed in Chapter 6 Traffic & Transportation of the EIAR, the Applicant's approach to the Traffic & Transportation impact assessment is in line with standard industry practice and in accordance with Transport Infrastructure Ireland's (TII) Traffic and Transport Assessment Guidelines.

The assessment methodology is consistent with the assessment methodology that has been applied for other major transport schemes in the Greater Dublin Area (GDA), namely the DART+ West, DART+ South-West and the Dublin BusConnects schemes (see Section 6.3.3 of Chapter 6). The National Transport Authority's (NTA) Regional Modelling System (RMS) Eastern Regional Model (ERM) and derived Dublin Local Area Model (DLAM) were used to assess the wider impacts of the improvement of the rail service, as is standard industry practice (Section 6.3.3 of Chapter 6). It is important to note that this operational modelling takes account of demographic growth and spatial planning data.

To further assess the local impact of the Proposed Development, i.e. the increased duration and frequency of level crossing closures on the Howth Branch, the current level crossing barrier opening and closing timings have been used to inform a traffic model assessing the effects on vehicles, cyclists, and pedestrians. The impacts have been assessed using LinSig modelling software. LinSig² is an industry standard software tool which allows traffic engineers to model traffic signals and their effect on traffic capacities and queuing. This was used to investigate the impacts of the changes in barrier closures on the surrounding road network (Appendix A6.1 of the EIAR).

The approach in assessing potential queueing was robust. The assessment assumed that the same volume of traffic that currently arrives at the level crossings would continue to arrive in future and makes no allowance for reduced vehicular traffic due to modal shift and the implementation of the Climate Action Plan (Section 6.3.3 of Chapter 6), which requires a 20% reduction in total vehicle km by 2030 (when compared to the 2030 business as usual).

² <https://www.jctconsultancy.co.uk/Software/LinSigV3/linsigv3.php>

Traffic surveys were carried out at the junctions either side of the Sutton and Kilbarrack level crossings on Thursday 11 May 2023. Traffic surveys were carried out at the level crossings itself along the Howth branch from Thursday 11 May 2023 to Wednesday 17 May 2023. The week-long data confirmed that Thursday 11 May 2023 is a normal representative neutral day, suitable for assessments purposes, in line with the relevant guidance³. Historical traffic data (2018/2019) was available at some of the junctions adjacent to the Kilbarrack and Sutton level crossings and a comparison of the 2023 traffic data and the historic traffic data (2018/2019) has shown that traffic levels observed in the more recent surveys have returned to pre-Covid levels in the study area. The most recent 2023 traffic count data were therefore considered a suitable data source for the assessment (Section 6.3.2 in Chapter 6).

It should be noted that while the proposed level crossing closure frequency (and in most cases level crossing closure durations) will increase, the operational constraints will remain in line with, and below, current level crossing closure durations and frequencies in other parts of the DART network (Section 4-8 in Appendix A6.1 of the EIAR).

Detailed assessment of the four existing level crossings and surrounding network along the Howth Branch has concluded that these level crossings can continue to operate and provide an appropriate level of cross connectivity and accessibility whilst still meeting the increased DART service frequency requirement. The increased frequency and duration of level crossing closures will result in a greater likelihood of vehicles, pedestrians and cyclists being required to queue at the crossings, however, the traffic modelling has shown that queue lengths are likely to remain within the available queueing road space. Hence, additional infrastructural interventions at the four level crossings are not considered necessary.

However, in order to mitigate against potential blocking back of queues from Kilbarrack (Baldoyle Road) and Sutton Level Crossing, it is proposed to provide yellow box markings at the Dublin Road & Sutton Road junctions to prevent the junction from being blocked and impacting on vehicular and public transport movements. Yellow box markings are already provided at all other major junctions along Sutton Road and Baldoyle Road. Significant effects may also be experienced by pedestrians and cyclists during abnormal highly trafficked days, for example at Cosh Level Crossing near Burrow Beach. On extremely busy days, an Garda Síochána will continue to have a presence at the level crossings (Section 6.6.2.1 in Chapter 6).

It is acknowledged that the effect on traffic and transportation in terms of general traffic is expected to be a negative, moderate, medium-term effect on the whole. On highly trafficked days, for example during the summer months, queues are more likely to block back at Kilbarrack (Baldoyle Road) and Sutton Level Crossings. On these days the effects on abnormally high levels of traffic can be classified as a negative, significant, medium-term effect (Section 6.5.2.4.3 of Chapter 6).

³ Project Appraisal Guidelines Unit 5.2 - Data Collection, PE-PAG-02016 December 2023 Transport Infrastructure Ireland

From an air quality perspective, the increases in queuing times are not considered significant from an air quality perspective as the changes in duration are considered minimal. These changes would result in similar effects as any changes to typical traffic light timings which is regularly undertaken across the road network. Furthermore, it is important to highlight the benefits of optimised and increased rail services, and the improvements that the implementation of the Climate Action Plan agenda, on vehicular traffic, such that traffic levels will reduce further or remain at current levels over time.

Specific issues were raised in respect of the air quality impact associated with increased traffic at level crossings. In respect of the level crossings on the Howth Branch, as outlined in Section 3.3 of Appendix 6.1 of the EIAR, barriers are predicted to be open between 27 minutes out of an hour to 47 minutes out of an hour, depending on the specific crossing. The changes in closure times between the existing and proposed scenarios at each level crossing is provided in the appendix. The assessment concludes that *“queuing depends on two factors – the duration of the closure and the frequency of the closure. An increase in frequency of the closure will not necessarily result in an increase in queueing as the duration of these closures may be shorter and therefore will prevent long queues from forming; if the volume of traffic is able to dissipate within the available opening times. In general, more frequent, shorter openings are likely to perform better than less frequent, longer openings, even if the total open time within the hour decreases.”*

From an air quality perspective, any potential reduction in queuing is beneficial with more free-flowing traffic generating less pollution. Any increases in queuing times are not considered significant from an air quality perspective as the changes in duration are minimal. These changes would result in similar effects as any changes to traffic light timings which is regularly undertaken across the road network.

2.3.1.4 Improvements/ Optimisation of Level Crossings

A significant number of submissions queried whether any changes could be made to the level crossing operations on the Howth Branch, such that improvements/optimisation of the signalling would enable level crossing closure times to be reduced.

Response to Issue Raised

As set out in Appendix A6.1 Section 2.2, level crossing initiation must comply with the Commission for Railway Regulation guidelines⁴ which are set out to safeguard road users. During normal operations the level crossings operate as part of the signalling system and are automatically lowered when a train passes a trigger point (referred to as a ‘strike in point’). The level crossing boom gates begin to rise immediately after a train clears sensors adjacent to the level crossing.

⁴ <https://www.crr.ie/assets/files/pdf/crr-g-006-c.pdf>

Level crossings play a vital role in ensuring the safety of both road users and rail passengers. When a train approaches a level crossing, the barriers are programmed to close based on precise calculations that prioritise safety above all else. These calculations consider the line speed, the braking distance required to stop safely, and the time it takes for the barriers to fully lower and secure the crossing.

For crossings located near station platforms, the barriers close in advance of the train's arrival at the platform. This measure is essential to eliminate the risk of road users being exposed to danger in the unlikely event of a train overrunning the platform. Similarly, when a train departs a station and approaches a crossing⁵, the barriers must remain closed to ensure the train can safely proceed. This situation will generally occur where the level crossing is located within 200m of the platform.

In some situations, barriers may remain closed for longer periods, such as when trains are approaching from opposite directions within a short interval. In these cases, reopening the barriers for a very brief period is avoided to discourage unsafe behaviour by road users, such as attempting to cross as barriers are lowering again. This practice is guided by the Commission for Railway Regulation's guidelines, which state that barriers should remain closed if the opening time would be less than nine seconds.

All of these arrangements are designed to ensure the safety of road users and the efficient passage of trains over the level crossings. In the case of Claremont level crossing, this means barriers will begin to drop once a train is timed to leave Howth Station platform, but the driver is not given permission to depart from the platform until the barriers are down. The driver should depart promptly once the signal facing the platform shows the driver can proceed.

The platform at Sutton Station is too close to Cosh level crossing (Lauder's Lane) to allow the driver to enter the platform from the west before the barriers are already down, to protect from a situation where the train overruns the platform. As a result, the barriers start to descend when the train is between Bayside and Sutton stations.

The level crossing closures are highly sensitive to the exact meeting point of trains in any given scenario; having trains cross simultaneously is the best case, as it allows two trains to pass for one closure. By contrast, the worst-case scenario would be two trains separated by a short period of time (e.g. approximately 20 seconds or less), meaning that the level crossing will be held down for the maximum amount of time.

The potential to delay trains to better coordinate with the operation of the crossing, for example to intentionally delay trains so that both directions pass the level crossing at the same time, and that level crossing closures are therefore limited, was investigated (Appendix A6.1 section 3.4). In all modelled scenarios there will only be one set of trains per direction passing each

⁵ In accordance with I-SIG-2062 Standard

other at the same time, and therefore the closure times can only be optimised for one crossing, resulting in the other crossings potentially having more frequent and/or longer closure times.

To approximate a range of potential timetables and resulting optimisations of train arrivals at level crossings, we have varied the departure times of the train in 10 different timetable sensitivity scenarios. The analysis has shown that queue lengths on the road for vehicular traffic are likely to remain within the available queueing capacity (Appendix A6.1 of the EIAR, Section 6). The assessment therefore concludes that the level crossings can continue to operate and provide an appropriate level of cross connectivity and accessibility whilst meeting the increased DART service frequency requirement.

2.3.1.5 Impact on Climate Policies/Sustainable Travel goals

A significant number of submissions raised concern that the Proposed Development, rather than encouraging a modal shift to public transport, would instead result in DART users reverting to using private cars, with a resultant negative impact on sustainable travel goals.

Response to Issue Raised

The Project proposes infrastructural changes which will enable an increase in the frequency of service on the Howth Branch from the current 3 trains per hour to 6 trains per hour, during peak periods. This is a significant enhancement of service frequency.

The Applicant acknowledges the concerns of respondents regarding the potential for the introduction of an interchange at Howth Junction and Donaghmede Station in the future (subject to future passenger demand). Every effort will be made to ensure that the upgrades at Howth Junction & Donaghmede Station deliver a seamless interchange between services, and that the commutes of passengers from the Howth Branch remain of an acceptable standard. It is important to note that the interchange at Howth Junction & Donaghmede Station will not necessarily be required at all times and the operation of a DART shuttle service would only come into effect when passenger demand requires the Northern Line & Howth Branch to be operated at maximum capacity.

Given the expected population growth and development ongoing and planned in Howth in the coming years, there is a need to ensure a reliable public transport system is available to cater for this growth. The DART+ Coastal North Project is an important part of this, together with planned active travel projects and the BusConnects programme. The Applicant notes that one of the key objectives of the DART+ Programme and the DART+ Coastal North Project, is to provide a safe, reliable, sustainable mode of transport to those along the railway line. In providing infrastructure that will enable a significant increase in service frequency on the Howth Branch, the DART+ Coastal North Project is fulfilling that objective, and is aligning with relevant international, national and local policy frameworks, including the National Planning Framework, the Climate Action Plan 2024 and the Transport Strategy for the Greater Dublin Area 2022-2042.

2.3.1.6 Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable

A significant number of submissions raised concern about the need to interchange at Howth Junction & Donaghmede Station (with the DART shuttle service) and the significant impacts this would have on those with a disability, the elderly and the vulnerable.

Response to Issue Raised

Accessibility is an important aspect of the design of the DART+ Programme. Where new interventions are made as part of the DART+ Programme, Iarnród Éireann will ensure that step free access is provided at DART platforms and that all current access & mobility standards and guidelines are followed in the designs.

Furthermore, Iarnród Éireann will continue to rollout separately funded projects including the Iarnród Éireann Accessibility Programme, the DART Platform Accessibility Project, and the DART Station Enhancement Project. Together, DART+ and the aforementioned projects and programmes, will improve access to persons with reduced & impaired mobility and passengers with sensory impairments including visual impairments.

It should be noted that use of the service by disabled persons is given the highest priority in regard to design of the Project. One of the major benefits of the Project is that it increases access to a fast, efficient, rapid rail service to a much larger population. More people and more disabled/elderly/vulnerable people will be able to use safe efficient and usable transport giving a net benefit to the population of disabled/elderly/vulnerable persons.

As detailed in the Railway Order application, in particular in Chapter 4 Description of the Proposed Development of the EIAR, a variety of significant modification works are proposed to Howth Junction and Donaghmede Station to *“both improve the passenger experience generally, and to develop the station to better serve as an interchange station into the future. The proposed works will involve modifying the entrances to provide a more accessible, user friendly and customer focused station for all rail users, as well as improving the connection to the surrounding areas of Donaghmede and Kilbarrack. Upgrades to the existing footbridge and connections to the centre platforms will also be carried out, as well as upgrades to lighting, signage, and finishes throughout”*.

The provision of facilities that cater for the needs of those with access & mobility needs is at the forefront of thinking when developing solutions such as those proposed at Howth Junction & Donaghmede Station. The proposed upgrades have been designed in accordance with all current design standards and guidelines to ensure all passengers are catered for in an equitable and appropriate manner.

For example, in the station entrances:

- The entrance doors have been increased in size to open up the entrance, increase visibility in and out of the station, connect better to the local communities and create a more inviting ticket hall space.
- An external canopy has been added to the entrances to provide external lighting and protect passengers from the elements when exiting.
- The gateline has been removed from ticket halls and ticket machines have been relocated so that the space is de-cluttered to improve visibility and access to the stair and lift.
- The floor finish has been upgraded to a slip-resistant flamed granite tile with all internal finishes made good.
- The main entrance intervention has been the remodelling of the stairs so that they are straight and avoid numerous 'switch backs' (as the current stairs) that prevent visibility from ticket hall to platform as well as from platform to the footbridge level. The stairs are wider than the existing with high quality slip resistant finishes, drainage, accessible handrails, and lighting to provide a safe and comfortable passenger environment. This improves the access from the ticket halls to all platforms as well as any interchanges taking place as the stairs will be visible from the platform side of both entrances.
- Below the stairs, secure bike storage is now provided for passengers to encourage active travel and give a direct link from the bike storage into the station.

In the footbridge:

- The central wall has been removed to significantly widen the footbridge space and create a much more pleasant passenger environment with increased day light and visibility to both sides of the bridge. New high-quality wall and floor finishes are also proposed.

In the connection from the footbridge to the central island platforms:

- The central platform area has increased in size to enable a new wide straight stair down to platform 2 and 3, two new lifts, a large seating and information area as well as an upgraded secondary entrance from the Baldoyle Industrial Estate including new signage and lighting.
- The existing stair and lifts are removed to open up the central platform area, and increase visibility across the platforms, remove blind corners, and improve intuitive wayfinding for interchanging between platforms.

Other station-wide upgrades include new signage, lighting, finishes as well as artwork opportunities with the intent of using local artists.

Iarnród Éireann is committed to serving the needs of older customers and those with accessibility challenges. The company has a dedicated Accessibility Users Group, which meets quarterly to discuss current and future plans for the organisation and the impacts that these plans have on those that find using the services more difficult than others. For those that travel with Iarnród Éireann and need assistance, a dedicated Accessibility officer is available and is happy to provide assistance. For more details see [Iarnród Éireann Accessibility](#).

Further to the above it should be noted that the new DART+ Fleet which will operate on the Northern Line and Howth Branch will provide DART trains that are better equipped to cater for the needs of any passengers who may suffer from mobility issues. One of the primary objectives of the design of the DART+ Fleet is to provide improved accessibility for train users. Spacious entrances and aisles will ease passenger flow throughout the train while strategically placed and plentiful grab handles help passengers balance and wait safely for the train to stop. Low level flooring and entrance doors reduce the stepping height for passengers and improve access for persons with reduced mobility. A retractable step at every doorway is deployed automatically before the doors open, it moves outwards to minimise the horizontal gap between the train and the platform. This will greatly improve access for persons with reduced mobility and minimise the risk of people falling.

Inductive hearing loops will be placed strategically throughout the new DART+ Fleet trains and 4 PIS (passenger information system) displays in each carriage will provide transformed customer information on-board, with real-time updates and information from other public transport systems in the Transport for Ireland network. These are designed for sensory impaired customers.

2.3.1.7 Impact on Emergency services

A significant number of submissions raised concern about the impact of the increased frequency of service on the level crossings on the Howth Branch and in particular on Emergency Services given the increased traffic.

Response to Issue Raised

The Applicant notes that consultation with representatives from the Emergency Services (Dublin Fire Brigade, which also provides ambulance services in the area) has taken place to ensure that the requirements of these vital services are met by DART+ Coastal North. No issues were raised by the Fire Brigade with regard to the proposals.

It is important to note that there are level crossings across the rail network where emergency services are accommodated without any significant issues on a daily basis.

In the event of a level crossing closure, the lane of opposing traffic (to where the queuing takes place) will be empty as a result of a closure, allowing for emergency services to easily bypass queuing traffic and get to the front of the traffic queue, minimising any delays.

The Applicant also notes that in an emergency event, the Emergency Services can contact the Irish Rail Centralised Traffic Control (CTC) in advance, on approaching a level crossing, and ask that the level crossing gates are maintained open or, if closed, opened at the earliest opportunity for them to pass.

2.3.1.8 Impact on Local Businesses from the loss of direct service

A number of submissions claimed that the loss of direct service would have a significant impact on local businesses in Baldoyle, Sutton and Howth, particularly through delays to their deliveries and longer journey times for staff and customers.

Response to Issue Raised

In the first instance, it is important to note that the DART+ Coastal North Project is primarily an infrastructure project, enabling the doubling of train frequency (3 to 6 trains per hour during peak periods) on the Howth Branch in the coming years, based on passenger demand. This is a significant increase in the level of service for the Howth Branch, which can only have a positive impact on local businesses in Baldoyle, Sutton and Howth.

As detailed within the Railway Order application, the proposed DART+ Coastal North Project is proposing infrastructure that would enable the operation of both a DART shuttle service on the Howth Branch line as required by future passenger demand, and/or a direct through service to/from Dublin City Centre. The proposals allow for the capacity and frequency of DART+ services on both the Northern Line and Howth Branch to be maximised – see response to Section 2.3.1.1 above.

It is also clear, as detailed in other responses herein, that any such future operational changes will require a public consultation process by the NTA (known as the Timetable Customer Consultation Process) prior to implementation, where any concerns of the public to the proposed timetable changes can be raised.

In respect of delays to journey times (for road deliveries or travel by road by staff, customers), the Applicant has set out a response to this aspect in our response to Section 2.3.1.3 above.

While at some point in the future, as demand increases, there will be a need to interchange at Howth Junction & Donaghmede station (through the implementation of a DART shuttle for some services) the DART+ Coastal North Project is intended to deliver an improved, more frequent service with an increased reliability of service.

2.3.1.9 Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth

A considerable number of submissions have noted the significant growth in the Howth area in terms of ongoing and planned development and have raised concerns about the ability of DART+ Coastal North to cater for this growth.

Response to Issue Raised

The policy context and need for the DART+ Coastal North Project is set out in Chapter 2 of the EIAR, which clearly demonstrates how the DART+ Programme and DART+ Coastal North in particular, are compliant with European, national, regional and local policy frameworks. It is clear that limited frequency and capacity on the DART network, including limited frequency and capacity on the Howth Branch, limits the potential growth of new communities along the railway corridor.

The need for the Project is set out in Section 2.4 of the EIAR, which includes a need to facilitate growth in demand. Higher frequency and higher capacity services must be provided to ensure convenient and viable alternatives are available to (current) road users, to promote a modal shift from unsustainable private car usage to public transport. Further, the DART+ Coastal North Project will support economic and population growth and will *“support land use policy allowing for these high-density developments along the railway corridors, as well as delivering high quality and efficient transport required to reduce congestion along commuter routes and support the wider movement of the workforce within the GDA”*.

Compact growth is also identified as a key need, with the following noted in Section 2.4 of the EIAR: *“It is evident that focussing development along railway corridors and providing higher densities at key transport nodes to create a compact urban form will increase the viability of public transport facilities, combat unnecessary urban sprawl, and reduce the unsustainable reliance on private car transportation. However, the public transport systems, as well as active travel links, must be in place for this to happen. The DART+ Programme will ensure a high capacity, integrated network is provided, enabling a more plan-led transport-oriented development approach which is fully aligned with Ireland’s international and national policy positions, and with recent institutional developments in relation to active land management by the State...”*.

Section 2.4 of the EIAR also states that *“Population growth and planned developments of significance along the extents of the Northern Line will benefit from the increased train frequency and greater train capacity provided by the DART+ Coastal North Project. Road traffic congestion will be reduced as a result of the modal shift from these development areas, from private cars to public transport. The DART+ Coastal North Project will allow for a greater volume of commuters to travel to Dublin City Centre in a more efficient and reliable way”*. For clarity, the reference to the “extents of the Northern Line” above, include the Howth Branch.

The proposed DART+ Coastal North Project will provide the infrastructure to support an increased capacity and frequency of service on both the Northern line between Dublin City Centre and Drogheda and the Howth Branch. DART+ Coastal North provides for an increase in frequency on the Howth Branch from the current 3 trains per hour to up to 6 trains per hour during peak periods. This clearly demonstrates that increased development along the Howth Branch, both in progress and planned, has been considered, and will be provided for by the Proposed Development.

2.3.1.10 Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures

A number of submissions have claimed that access to schools both on the Howth peninsula and schools at greater distance, will be impacted both by the loss of direct service and the increased level crossing closures. These submissions also claim that the need to interchange at Howth Junction & Donaghmede Station is a significant concern with regard to school students, given the perceived security and anti-social behaviour issues at this station.

Response to Issue Raised

The Applicant has set out in response to other issues raised in relation to the level crossing closures, the best practice methodology that was adopted and the appropriateness of the assessment in this regard, in terms of the use of TII Traffic & Transport Assessment Guidelines, the NTA Regional Modelling System (RMS) Eastern Regional Model (EMR) and the derived Dublin Local Area Model (DLAM), see Chapter 6 Traffic & Transportation of the EIAR and Section 6.3.3 in particular for further details. Section 6.3.2 sets out our approach to traffic surveys, which again were undertaken in line with best practice methodology.

As detailed in Chapter 6, to further assess the local impact of increased duration and frequency of level crossing closures to allow for an increased number of train services in the future, the current level crossing barrier opening and closing timings were used to inform a traffic model assessing the effects on vehicles, cyclists, and pedestrians. The impacts were assessed using LinSig modelling software. LinSig is an industry standard software tool which allows traffic engineers to model traffic signals and their effect on traffic capacities and queuing. This was used to investigate the impacts of the barrier closures on the surrounding road network (Appendix 6-1). The approach in assessing potential queueing was robust in the sense that it assumed that the same volume of traffic that currently arrives at the level crossings would continue to arrive in future and made no allowance for reduced vehicular traffic due to modal shift and the implementation of the Climate Action Plan (Section 6.3.3 of Chapter 6), which requires a 20% reduction in total vehicle km by 2030 (when compared to the 2030 business as usual).

Detailed assessment of the four existing level crossings and surrounding network along the Howth Branch has concluded that these level crossings can continue to operate and provide an appropriate level of cross connectivity and accessibility whilst still meeting the increased DART service frequency requirement. The increased frequency and duration of level crossing closures will result in a greater likelihood of vehicles, pedestrians and cyclists being required to queue at the crossings, however, the traffic modelling and sensitivity analysis has shown that queue lengths are likely to remain within the available queueing road space in all cases. Therefore, additional infrastructural interventions at the four level crossings are not considered necessary.

In order to mitigate against potential blocking back of queues from Kilbarrack (Baldoyle Road) and Sutton Level Crossing it is proposed to provide yellow box markings at the Dublin Road & Sutton Road junctions to prevent the junction from being blocked and impacting on vehicular

and public transport movements. Yellow box markings are already provided at all other major junctions along Sutton Road and Baldoyle Road.

It is acknowledged that the effect on traffic and transportation in terms of general local traffic is expected to be a negative, moderate, medium-term effect on the whole. This means that there will likely be increases in travel time for vehicular traffic as well as pedestrians and cyclists at the level crossings, particularly during the AM peak, when school traffic coincides with peak commuter traffic.

Again however, the above takes no account of the likely positive impact that optimised and increased rail services, and the implementation of the Climate Action Plan agenda will have on vehicular traffic, such that traffic levels will reduce or remain at current levels over time.

The introduction of a DART shuttle service and the need to interchange at Howth Junction & Donaghmede Station is also a concern raised in submissions, both in terms of journey times and the perceived security and anti-social behaviour issues at this station. Journey times are addressed in our response to Section 2.3.1.2 above.

A response in terms of security and anti-social behaviour concerns is provided in Section 2.3.1.12 below.

2.3.1.11 Impact on Tourism

A number of submissions have noted the importance of tourism to Howth and the surrounding area and have claimed that the significant impact is likely to result from the Proposed Development.

Response to Issue Raised

Howth is acknowledged as an important tourism destination in the Greater Dublin Area, and it is important that we maximise the economic opportunity that this provides. The provision of DART+ Coastal North is seen as positive in this respect. As detailed in Chapter 7 Population of the EIAR (Section 7.5.4.2), *“No negative impact on tourism is anticipated. Indeed, the more frequent services will improve the accessibility and comfort of journeys for tourists”*. Further, in Section 7.5.4.2, it is concluded that *“There would be a positive impact on the consumer/hospitality/sailing economy in Howth due to the potential for more tourism visits, although it is noted that the number of visitors can be perceived by local residents to already be high at times in the peak summer season”*. This assessment is confirmed by the views expressed by Fáilte Ireland in its submission, where it states that *“Tourism and transport go hand in hand and tourism displays a high dependency on public transport in particular for its successful operation.”* Further it notes that *“an efficient and reliable public transport system is a key requirement and enabler to creating a great tourist experience, particularly in Dublin where tourists tend to use public transport more than in other parts of the country.”* With specific reference to the potential future DART shuttle service on the Howth Branch, the submission notes that *“For visitors, changing trains is nothing new and is something that is expected in capital cities”*. The submission goes on to say that *“The proposals should allow*

for the capacity and frequency of DART+ services on both the Northern Line and Howth Branch to be maximised. Ultimately from a visitor perspective, their key consideration is that services are both more frequent and more reliable.” The Fáilte Ireland submission does go on to note that “*Generally, visitors may utilise DART+ outside of the morning peak and any final operational decisions, relating to the potential for the operation of a shuttle service on the Howth Branch in future, together with when/how this shuttle would operate (e.g. during peak times, etc) must take into consideration the needs and travel patterns of visitors to and from Howth.*”

2.3.1.12 Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station

A number of submissions raise concern about the suitability of Howth Junction & Donaghmede Station for use as an interchange station, given perceived security and anti-social behaviour issues at this station.

Response to Issue Raised

Concern was raised throughout the non-statutory public consultation process about perceived security and anti-social behaviour at Howth Junction & Donaghmede Station. The Applicant has listened to the concerns of the public in this regard and has responded directly to this concern in developing the design for DART+ Coastal North. A variety of significant modification works are now proposed, as detailed in Section 4.7.3.1 of the EIAR and the accompanying RO drawings, to “*both improve the passenger experience generally and to develop the station to better serve as an interchange station*”. As detailed therein, “*the station works will also involve modifications to the station entrances to provide a more accessible, user friendly and customer focussed station for Donaghmede and Kilbarrack. Upgrades are proposed to the station footbridge and connections to the centre platforms, as well as to the lighting, CCTV system, signage and finishes throughout. The improvement at the Donaghmede entrance will also provide direct access to Platform 4 and connectivity via the footbridge*”. Further clarity and detail on these proposals is provided in the response under Section 2.3.1.12 above.

The interchange at Howth Junction & Donaghmede station will also be facilitated by an increase in Northern Line stopping trains, which will minimise wait times for connecting services. These measures will significantly improve customer experience and minimise any concerns in respect of security and anti-social behaviour.

In more general terms, Iarnród Éireann continues to work to provide a safe rail network for all users. The majority of train users travel without incident. Iarnród Éireann actively monitors the network to help create a safe travel and work environment for both Iarnród Éireann staff and customers. Significant resources are put into security with €5.7M spent on these measures in 2021, up from €3.7M in 2016. There are a range of existing measures in place across the DART and Commuter network designed to help mitigate against anti-social behaviour (ASB), including:

- A TEXT alert system is in place on trains (51444 TRAIN) for members of the public to report incidents of ASB in real time so assistance can be dispatched as needed. This will feed into the recently established NTA Customer Consolidated Call Centre which will include additional Real Time Alert options including WhatsApp.
- Joint operations with Gardaí have proven most effective and are planned to continue. The roll out of Garda Response Hubs around the network to assist on-board staff to deal with problematic passengers have provided much peace of mind to passengers and staff alike. Additionally, four Garda Interchange Hubs have been established with Public Transport Operators across the GDA. Iarnród Éireann regularly work closely with An Garda Síochána (AGS) in targeted joint operations to address issues of anti-social behaviour on the network and the issuing of fixed penalty notices where appropriate. Garda Liaison Officers have been appointed in each Garda Division to liaise with IÉ Managers. Moving forward, Iarnród Éireann will be co-locating with (AGS) in the new National Train Control Centre at Heuston Station.
- CCTV at all stations is monitored in real time by a team from our security monitoring centres. The security monitoring rooms actively monitors the DART and Commuter stations CCTV across the wider network, and the supervisory team coordinates the security response in the Greater Dublin Area as required.
- Teams of security operatives patrol the network to ensure the safety and security of our customer and staff members.
- Fare evaders are targeted by the Revenue Protection Officers (RPOs) ensuring issue of fare penalty notices. The presence of RPOs discourages anti-social behaviour.
- Iarnród Éireann, in conjunction with An Garda Síochána, now have a team specifically dedicated to targeting and addressing crime and ASB on our Network, to ensure that those who are engaged in criminal activity are brought before the criminal courts.
- In order to increase safety at Level Crossings for both Rail and Road users, An Garda Síochána, in cooperation with Iarnród Éireann, has commenced a programme to enforce speed and red light running under the Road Traffic Acts at High Risk Level Crossings.

Finally it should be noted that in Iarnród Éireann's most recently published Safety and Security report ([24-Q2-Customer-Safety-and-Security-Report-FINAL.pdf](#) for Q2 2024), there were two alleged assaults on persons, and three instances of aggressive behaviour at Bayside Station and at Howth Station there were two incidents of graffiti, one theft of property, one incident of fighting and two incidents of aggressive behaviour. At Howth Junction & Donaghmede Station, by contrast, there were two incidents of aggressive behaviour and one incident of fighting. While one incidence of anti-social behaviour is too much, the record of such incidents at Howth Junction & Donaghmede Station are in fact lower than those of both Bayside and Howth stations.

2.3.1.13 Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station

A considerable number of submissions have raised concerns, that when the DART shuttle is introduced in the future (for those passengers from the Howth peninsula interchanging at Howth Junction & Donaghmede Station into the city centre), there will be no capacity on the Northern Line trains arriving at this station, as these trains will already be full.

Response to Issue Raised

The Applicant notes the concern of those on the Howth Branch, where a DART shuttle may be introduced in the future, about capacity on the DART trains that they will join at the interchange at Howth Junction & Donaghmede station.

When considering the availability of adequate space/capacity on receiving DART services to cater for the Howth Branch passengers connecting with Northern Line services it is important to note that the DART+ Coastal North Project will facilitate an increase in frequency of DART services on the Northern Line to nine services each way per hour between Howth Junction & Donaghmede Station and Dublin Connolly, subject to future demand.

The inclusion of turnback infrastructure as part of the DART+ Coastal North Project, also ensures that services can originate/terminate more easily at various points along the Northern Line. In this regard, it is important to note that not all services will operate between Drogheda and Dublin City Centre, and it is anticipated that two of the nine services per direction per hour referred to above will originate/terminate from/at Malahide and an additional two services will originate/terminate from/at Clongriffin (and not Drogheda). As a result, it is expected that there will be ample capacity on receiving trains arriving at Howth Junction & Donaghmede Station to cater for passengers connecting from services on the Howth Branch. While this is the case, it is acknowledged that there may not always be a seat available for those joining. The journey time to the city centre, however, is relatively short and worldwide it is normal practice for commuters to stand at peak travel times.

A summary of DART frequencies and capacities when operating at maximum capacity is presented in Figure 4-2 in Chapter 4 Description of the Proposed Development of the EIAR. This figure is reproduced below for clarity.

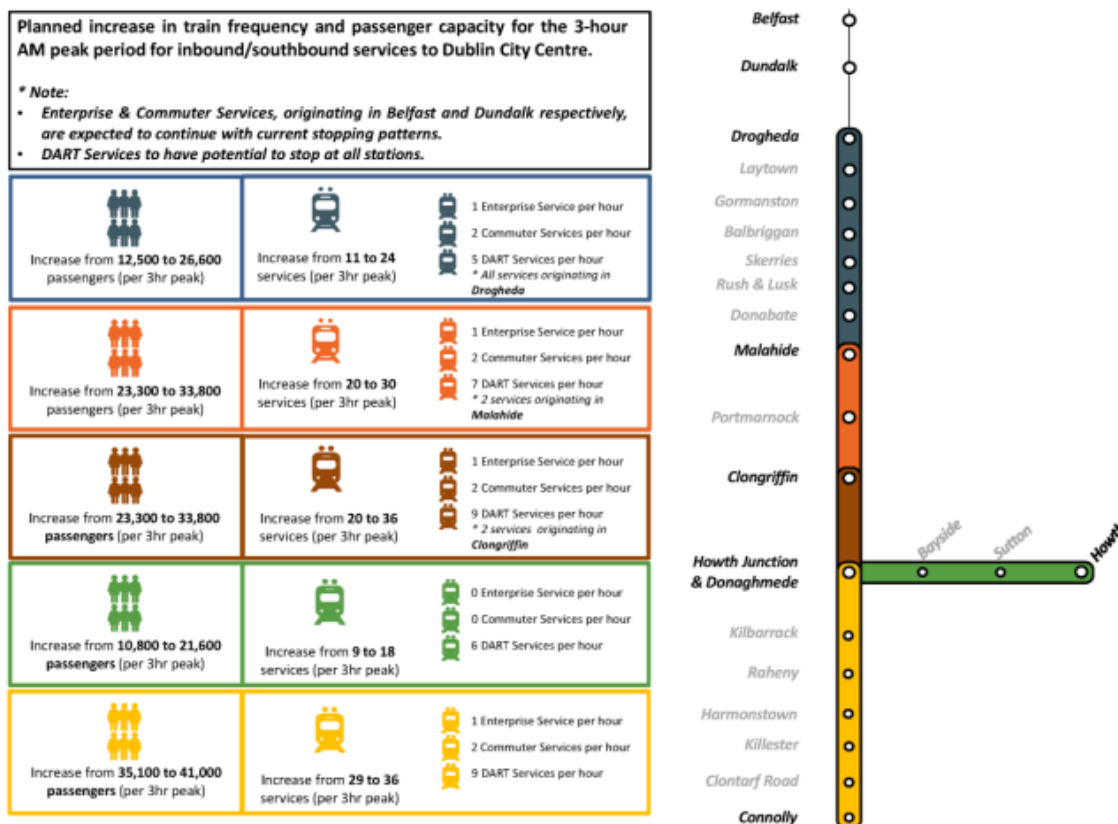


Figure 5 - EIAR Chapter 4 Image 4-2 Service capacity increases during AM peak period

2.3.1.14 Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station

See answer provided under Section 2.3.1.5 above, in respect of the impact on 'Climate Policies/Sustainable Travel Goals' above.

2.3.1.15 Concern around increased population in Howth

See answer under Section 2.3.1.9 above, in respect of 'Inaccurate Surveys related to growth in Howth and the ability of DART+ Coastal North to cater for this growth' above.

2.3.1.16 Need to look at alternatives

A number of submissions noted that other alternative solutions need to be investigated to increase the capacity of the DART network, including a four-track solution between Dublin City Centre and Howth Junction & Donaghmede Station.

Response to Issue Raised

Increasing the number of tracks, tunnelling the rail line, or the introduction of grade separation at level crossings is not proposed as part of the Preferred Option for the DART+ Coastal North Project.

The main objective of the DART+ Coastal North Project is to maximise the existing assets in the short-medium term, to deliver a higher frequency, higher capacity, reliable, electrified route to enable an increased DART service frequency between Drogheda and Dublin City Centre.

It is currently considered possible to deliver these objectives without the introduction of much more significant interventions. Upgrades to telecommunication and signalling infrastructure along the Northern Line will also contribute to meeting the Project objectives. Options such as developing sections of four-tracking or introducing underground sections of railway are seen as being overly impactful on the surrounding areas and environment, being extremely costly, and as being unnecessary to allow for DART+ Coastal North to achieve its objectives. As noted above, the DART+ Coastal North Project would not prohibit the development of these types of projects in the future under separately funded projects should the need be identified.

Consideration was not given to grade separation at level crossings because whilst it is acknowledged that the proposed increased level crossing closure frequency and duration will increase, the assessment of impacts on vehicles, cyclists and pedestrians concluded the level crossings will continue to provide adequate levels of service and cross-rail connectivity. Hence, there was no requirement for intervention, such as a tunnel under the line, at the level crossings. Any such option is seen as being overly impactful on the surrounding areas and environment, being extremely costly, and as being unnecessary to allow for DART+ Coastal North to achieve its objectives.

When considering options such as the operation of DART services in an alternating sequence of services or operating a shuttle between Howth Junction & Donaghmede and Drogheda there are three main elements to consider:

(1) The existing track layout at Howth Junction & Donaghmede Station would not be able to accommodate the required frequency of trains approaching from the Northern line, for turnback purposes – whereas the proposed frequency of DART shuttle service on the Howth Branch can be delivered in an efficient manner with the proposed revised layout and new turnback facility.

(2) The Project team is confident that the available onboard capacity coupled with the additional train frequency of passenger services that originate from Dundalk, Drogheda, Malahide and Clongriffin will be more than adequate to accommodate passengers arriving at Howth Junction & Donaghmede from the three stations on the Howth Branch. On the other hand, based on a frequency of 6 trains per hour per direction originating in Howth, there would not be sufficient onboard capacity to cater for those passengers alighting from stations along the Northern line at Howth Junction & Donaghmede station for interchange purposes.

(3) Should Howth Junction & Donaghmede Station be utilised to accommodate a DART shuttle service for those passengers arriving from the Northern line (Drogheda) to interchange onto a service originating from Howth, the frequency of train service on the Howth branch would need to effectively go beyond the proposed 6 trains per hour per direction to meet expected passenger demand and growth. The consequence that such an increase in train frequency would have on the operation of the level crossings along the Howth branch when considering the interface between rail / road traffic would be significant.

2.3.1.17 Concerns over a lack of clarity over when the Shuttle will be operated - The people of Howth require clarity

A number of submissions raise the concerns of the people of Howth as to how the DART shuttle will operate, in terms of future timetabling. The submissions state that the public consultation failed to provide sufficient detail on the proposed DART shuttle service and the future timetables, which will be the main impacting factor on the Howth Branch.

Response to Issue Raised

The Applicant understands the concern expressed in this regard but has been clear, as further clarified in the response under Section 2.3.1.1 above, that a DART shuttle service is required in order to maximise the frequency of service on both the Northern Line and the Howth Branch and explains the reasons for this.

The response under Section 2.3.1.1 also makes it clear that the enhancement of the service on the Howth Branch will include a combination of a direct service to the city centre and a DART shuttle service between Howth and Howth Junction & Donaghmede Station.

This response also explains that while the Project proposes the enabling infrastructure, the future operational changes will be implemented over time and in response to increasing demand, so certainty as to these timetable changes is not possible at the current time. Any such operational changes, including the introduction of a DART shuttle service on the Howth Branch, will be subject to public consultation by the NTA, (known as the Timetable Customer Consultation Process) prior to implementation, where any concerns of the public to the proposed timetable changes can be raised.

These issues were raised by respondents to both non-statutory public consultations undertaken as part of the DART+ Coastal North Project (PC1 and PC2). Comprehensive responses to the issues raised were provided in the PC1 Findings Report and the PC2 Findings Report, both of which were included in the Railway Order application (Annex A3.1 and Annex A3.2, Volume 4 Appendices of the EIAR).

2.3.1.18 Concerns of the people of Howth being taken into account

A number of submissions noted that in their view, the concerns of the people of Howth had not been taken into account in the DART+ Coastal North project.

Response to Issue Raised

Extensive consultation with relevant stakeholders has been undertaken to date in respect of the DART+ Coastal North Project. In addition to the statutory consultation process, the Applicant has undertaken two non-statutory public consultation periods, significant consultation with the relevant local authorities (including elected members), statutory bodies, non-government organisations and affected landowners. This consultation has helped to inform our options selection process and design development.

The concerns of the people of Howth were particularly raised by respondents to both non-statutory public consultations undertaken as part of the DART+ Coastal North Project (PC1 and PC2). Comprehensive responses to the issues raised were provided in the PC1 Findings Report and the PC2 Findings Report, both of which were included in the Railway Order application (Annex A3.1 and Annex A3.2, Volume 4 Appendices of the EIAR).

The Applicant has listened to and responded to these concerns. In particular, with respect to Howth Junction & Donaghmede station, significant concern was raised about the suitability of this station to operate as an interchange station. The Applicant has listened to the concerns of the public in this regard and has responded directly to this concern in developing the design for DART+ Coastal North. A variety of significant modification works are now proposed to the station, as detailed in Section 4.7.3.1 of the EIAR and the accompanying RO drawings, to *“both improve the passenger experience generally and to develop the station to better serve as an interchange station”*. As detailed in the EIAR, *“the station works will also involve modifications to the station entrances to provide a more accessible, user friendly and customer focussed station for Donaghmede and Kilbarrack. Upgrades are proposed to the station footbridge and connections to the centre platforms, as well as to the lighting, CCTV system, signage and finishes throughout. The improvement at the Donaghmede entrance will also provide direct access to Platform 4 and connectivity via the footbridge”*. The interchange at Howth Junction & Donaghmede station will also be facilitated by an increase in Northern Line stopping trains which will minimise wait times for connecting services. These measures will significantly improve customer experience and minimise any concerns in respect of security and anti-social behaviour.

In respect of the potential for a DART shuttle service to operate on the Howth Branch in the future, the Applicant notes the concerns that have been raised. The Applicant is, however, tasked with providing infrastructure which will maximise the capacity and frequency of service for the DART on both the Northern Line and Howth Branch. The response under Section 2.3.1.1 above notes that a DART shuttle service is required in order to maximise the frequency of service on both the Northern Line and the Howth Branch and explains the reasons for this.

The Response under Section 2.3.1.17 above, also notes that any future operational/timetable changes, including the introduction of a DART shuttle service on the Howth Branch, will be subject to public consultation by the NTA, (known as the Timetable Customer Consultation Process) prior to implementation, where the public can raise any concerns in relation to the proposed timetable changes.

2.3.2 Howth Lodge / Claremont Level Crossing

A number of submissions were received from residents of the Howth Lodge complex and residents on Claremont Road in relation to impacts on their access arrangements and the increase in level crossing closures at Claremont Level Crossing that will result from DART+ Coastal North.

The DART+ Coastal North Project is providing the enabling infrastructure such that the frequency of service on the Howth Branch can increase from the current 3 trains per hour, to 6 trains per hour at peak periods. The submissions raise a number of issues in relation to the current Project proposals, particularly in respect of the impacts on the Claremont Level Crossing, which is the sole access point to these residences.

The most prominent issues raised in submissions relevant to Howth Lodge /Claremont Level Crossing are set out below, while other more submission-specific issues are responded to in the individual submission responses.

2.3.2.1 Frequency and duration of Claremont level crossing closures – level of access

A number of submissions from residents of Howth Lodge and Claremont Road have raised concern about the impact of the increased level of service on the Howth Branch and the associated impact on level crossing closure frequency and duration. The submissions claim that this will reduce the level of accessibility to residences to an unacceptable and unreasonable level.

Response to Issue Raised

The Applicant notes that the Claremont level crossing provides access across the railway to 55 residences within the Howth Lodge complex and 8 private residences along Claremont Road⁶. There is no other means of access to these properties by road.

No infrastructural changes are proposed to this level crossing. However, the DART+ Coastal North Project, through infrastructural changes at Howth Junction & Donaghmede Station and elsewhere on the DART network, is enabling an increase in the frequency of service along the Howth Branch, from 3 trains per hour to 6 trains per hour (each direction), during peak periods.

This increased level of service will increase the frequency and duration of the level crossing closures along the Howth Branch, including at Claremont level crossing. The Applicant acknowledges that this will have an impact on the residents of Howth Lodge and Claremont Road as a result.

⁶ The Applicant did state that in Appendix A6.1 this road was noted as a private road, but it is acknowledged that this is a public road, which provides access to 8 private residences.

1. Level Crossing Operation

Prior to addressing the specific issue raised, the Applicant refers to the response under Section 2.3.1.4 herein which describes how the level crossings on the Howth Branch operate and the specific constraints/sensitivities associated with their operation. This is useful context and highlights the sensitivity of the level crossing closures to the exact meeting point of trains along the railway line.

It is also useful to refer to Appendix A6.1 DART+ Coastal North Level Crossing Assessment, in Volume 4 of the EIAR, which, in Section 3.2 of that document, sets out the modelling parameters used to assess the level crossing closures on the Howth Branch. This details how *“the modelling assumes that all level crossings are automatic and require safe closure before the signals can be set for the approaching train. Between barrier closures, the road will need to be open for a minimum of 20 seconds, otherwise the barriers will remain down, and the crossing closed. The crossing is assumed to begin to open once the train passes a clearance point, assumed to be 10m from the level crossing, and the barriers are assumed to take 8 seconds to open.”*

The Applicant notes that the reference to the road being open for a minimum of 20 seconds above, is to ensure that there is adequate time for vehicles to cross the level crossing while it is open. The Commission for Railway Regulation’s guidelines state that barriers should remain closed if the opening time would be less than nine seconds.

2. Modelling Parameters

Section 3.2 of Appendix A6.1 of the EIAR details how:

“The modelled closure times are based on the average value between the 5th and 95th percentile of all observed closure times and are centred around the time when the trains pass each level crossing. The level crossing closure data was calculated based on control centre data received from IÉ.”

Section 3.2 then goes onto describe how:

“Modelling has been undertaken with three objectives:

- To calibrate and validate the closure behaviour of the existing 3TPH Working Timetable, to use as a baseline assumption for future scenarios*
- To examine the impact of an increase in train frequency for 4, 5 and 6 TPH*
- To examine the sensitivity of level crossing closure times dependent on the timetable structure and/or performance of the 6 TPH TSS1C timetable*

Modelling covers the following 14 service variations per direction:

- 3 TPH (Reflects Working Timetable – i.e. the baseline scenario);*

- 4 TPH (regular intervals);
- 5 TPH (regular intervals);
- 6 TPH (regular intervals, reflects TSS 1C);
- 6 TPH with 1-minute offset;
- 6TPH with 2-minute offset;
- 6TPH with 3-minute offset;
- 6TPH with 4-minute offset;
- 6TPH with 5-minute offset;
- 6TPH with 6-minute offset;
- 6TPH with 7-minute offset;
- 6TPH with 8-minute offset;
- 6TPH with 9-minute offset; and
- 6TPH with 10-minute offset.

All offset scenarios are based on the 6 TPH TSS1C, with all down direction trains offset by a period of time. Since TSS1C is not necessarily the timetable to which trains will operate following implementation of the DART+ Programme, this serves as a sensitivity check to evaluate how differently the level crossings will behave if services are more, or less, synchronized.”

The Applicant (as part of the EIAR) and as detailed in Section 3.3 of Appendix A6-1 therein, modelled, in RailSys, the level crossing opening/closure times for the entire Howth Branch line for the 14 different service variations listed above. As detailed above, this serves as a sensitivity check to evaluate how differently the level crossings will behave if services are more, or less, synchronised.

As detailed in Section 3.3 of Appendix A6-1 “TSS1C is the main service scenario, assuming trains will leave every 10 minutes, with services departing from Howth Junction & Donaghmede Station and services departing Howth Station separated by ten minutes.”

3. Barrier results

As detailed above, the level crossing closures are highly sensitive to the exact meeting point of trains in any given scenario; having trains cross simultaneously is the best case, as it allows two trains to pass for one closure. By contrast, the worst scenario would be two trains

separated by 20 seconds or less, meaning that the level crossing will be held down for the maximum amount of time.

As detailed in Section 3.3 of Appendix A6-1, to “test the effect of differing meeting points - stemming from different service patterns - scenarios offsetting the departure time of down trains by 1 to 10 minutes were run. Since the level crossing closure times depend on the relative meeting point between down and up services, it is only necessary to offset trains in one direction. Offsets were continued up to + 10min, at which point a regular 6 TPH per direction service like the Howth Branch line will bring the timetable back to its starting point.”

“The results in the table below show that opening numbers increase and decrease but are not detrimentally impacted by a changing timetable or timetable performance. Intuitively, the fewer trains being run per hour, the longer the barriers will be open.”

The table referenced in the paragraph above is Table 3.1 from Appendix A6-1 of the EIAR, which is reproduced below for ease of reference:

Table 3.1 Level Crossing Open Time Results – range of open time and total open time in any given hour for 6 TPH and 10 different timetable structures

	Claremont (913)	Cosh (915)	Sutton (916)	Kilbarrack (917) (Baldoye Road)
TSS1c	6 - 12 Openings (02:22 to 07:09) Sum: 28:26 to 42:52	6 - 12 Openings (02:26 to 07:00) Sum: 29:13 to 42:02	6 - 12 Openings (02:18 to 07:49) Sum: 27:41 to 46:54	6 - 12 Openings (02:27 to 07:52) Sum: 29:10 to 47:10
3 TPH per direction (WTT)	5 Openings (02:23 to 12:21) Sum: 42:36	3 Openings (01:43 to 17:47) Sum: 46:12	3 Openings (04:39 to 17:07) Sum: 48:39	5 Openings (00:37 to 15:25) Sum: 44:24

As detailed above for the TSS1c scenario (i.e. 6 trains per hour per direction), the Claremont level crossing would be **open** between 6 and 12 times within the hour, for a duration of between 02 minutes 22 sec and 07 minutes and 9 seconds, with a total **open** time of between 28 minutes and 26 seconds and 42 minutes and 52 seconds.

The Applicant notes that, at other times, when train frequency is below the maximum 6 trains per hour, the level crossing closure frequency and closure durations may reduce.

The Applicant also tested the impact of an increase in train frequency from 3 trains per hour per direction (TPHPD) to 4 and 5 TPHPD, so as to see the impact of increasing frequency (but below the maximum TSS1c frequency). To do this, as detailed in Section 3.3 of Appendix A6-1, “estimates for the average sum of minutes of open time have been calculated for each respective frequency on a clockface pattern. The values presented below are subject to change with a change of departure time. The model results for these can be observed in the table. These have only been modelled to test the sensitivity of increasing train frequencies.

Therefore, no transport assessment has been undertaken for these options. Note that in each respective timetable, trains in each direction start on the hour in these instances.”

Again, for ease of reference, the Applicant has reproduced the table referenced above (Table 3.2 in Appendix A6-1) below:

Table 3.2 Level Crossing Open Time Results – range of open time and total open time in any given hour for 4 and 5 TPH – not included in the vehicle impact assessment

	Claremont (913)	Cosh (915)	Sutton (916)	Kilbarrack (917) (Baldoyle Road)
5 TPH per direction	10 Openings Average: 03:22 Sum: 33:40	5 Openings Average: 07:00 Sum: 35:00	5 Openings Average: 09:49 Sum: 49:05	5 Openings Average: 07:10 Sum: 35:50
4 TPH per direction	8 Openings Average: 04:52 Sum: 44:24	4 -Openings Average: 10:00 Sum: 40:00	4 Openings Average: 12:49 Sum: 51:16	4 Openings Average: 10:10 Sum: 40:40

This indicates that for 4 TPHPD, the Claremont level crossing will be open 8 times per hour, for an average open duration of 4 minutes and 52 seconds and an overall open duration within the hour of 44 minutes and 24 seconds. For 5 TPHPD, the level crossing will be open 10 times per hour for an average open duration of 3 minutes and 22 seconds and a total open duration of 33 minutes and 40 seconds.

From the above, level crossing closures at Claremont will increase from approximately 5 or 6 times per hour to between 6 and 12 times per hour, depending on the future operational timetable.

As detailed in Section 6 of Appendix A6-1, the duration of these closures may also increase to varying degrees, depending on the operational timetable. An averaged closure time was assessed for the purposes of the analyses, but fluctuations in the timetable were addressed as part of a sensitivity analysis as described in Section 4.6 of Appendix A6-1. This sensitivity analysis was done by inputting the barrier results from the 6TPHPD 1 to 9 minute offset outlined both in Section 3 of Appendix A6-1 (and listed above). It is noted that the 10-minute offset is the same as a regular timetable.

Table 4.30 in Appendix A6-1 summarises the results for Claremont level crossing in this regard.

4. Clerical Error

The Applicant does wish to note a clerical error in Table 4.30 in Appendix A6.1 DART+ Coastal North Level Crossing Assessment, in Volume 4 of the EIAR. This table relates to the current closure times which were noted therein. This was an inadvertent error which the Applicant now seeks to correct. The original and the corrected versions of Table 4.30 are set out below.

The original Table 4.30 in that report was as follows:

Table 4.30 Comparison of Level Crossing Closure Times – Claremont (913)

Location	Number of Closures per hour	Total closure time per hour	Minimum single closure time	Maximum single closure time	Assessed Timetable
Baseline Claremont (913) Level Crossing	6	00:15:47	00:02:38	00:02:38	00:02:38
Proposed Claremont (913) Level Crossing	6 or 12	00:17:08 to 00:31:34	00:02:38	00:04:51	00:02:38 6 times per hour

The corrected Table 4.30 is as follows:

Location	Number of Closures per hour	Total Closure time per hour	Minimum single closure time	Maximum single closure time	Assessed Timetable
Baseline Claremont (913) Level Crossing	6	00:15:47	00:01:31	00:03:50	00:02:38
Proposed Claremont (913) Level Crossing	6 to 12	00:17:08 to 00:31:34	00:02:38	00:04:51	00:02:38 12 times per hour

The corrected version of Table 4.30 does not impact on the assessment, with the residual impacts remaining as those documented in Appendix A6.1 and Chapter 6 Traffic and Transportation of the EIAR:

“this level crossing will operate slightly worse for vehicles, but it is not expected to have a significant impact in terms of queueing due to the low volumes of vehicles that cross the level crossing.”

The corrected Table 4.30 as shown above indicates that, in the existing situation, with 3 trains per hour, the closure time at the level crossing varies between 1 minute and 31 seconds and 3 minutes and 50 seconds, with a maximum total closure time per hour of 15 minutes 47 seconds.

When, in the future, the demand increases and the full-service enhancement delivered by DART+ Coastal North is realised, (i.e. 6 trains per hour during peak periods), the level crossing closure frequency may increase beyond this. The number of closures is likely to be 12 times

per hour as it is assumed that the future operational timetables will prioritise having minimal impact on the most critical level crossing between Howth Junction and Howth.

In this future scenario therefore, the closure time at Claremont level crossing will vary between 2 minutes and 38 seconds and 4 minutes and 51 seconds, depending on the scenario with a maximum total closure time per hour of 31 minutes and 34 seconds.

5. Effects on vehicles, pedestrians and cyclists

To assess the effect of the increased frequency and duration of level crossing closures, it was necessary to consider the existing traffic (vehicles, cyclists and pedestrians) using this crossing. Link traffic volumes were surveyed at the Claremont level crossing from Thursday 11 May 2023 to Wednesday 17 May 2023 to understand the travel pattern across a 7-day period in this area. More detailed classified junction turning volumes were surveyed at the R105 Howth Road / Howth Lodge junction specifically on Thursday 11 May 2023. The weeklong data confirmed that Thursday 11 May 2023 was a normal representative neutral day, suitable for assessment purposes, in line with the relevant guidance.⁷

The surveys (see Section 6.3 of Chapter 6 Traffic & Transportation in the EIAR), show that the volume of vehicles crossing Claremont (913) Level Crossing is relatively low. The data for the representative day (Thursday 11th May 2023) surveys show only 6 vehicles travelling northbound and 8 travelling southbound across the rail line between 08:00 and 09:00; and 10 northbound and 6 southbound between 17:30 and 18:30. No significant variation in traffic was observed across the survey period.

Similarly, in terms of pedestrians, the surveys carried out as part of the EIAR showed that of all four of the level crossings on the Howth Branch, this is the least used by pedestrians. Surveys have shown only 97 pedestrians crossing the level crossing on a daily basis between 06:00 and 20:00.

Therefore, while the likelihood of vehicles/pedestrians incurring delay will increase in the future due to the increased train frequency, it is not expected to have a significant impact in terms of queue length or waiting times, due to the low volumes of vehicles/pedestrians that cross at this level crossing.

2.3.2.2 Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877

A number of submissions noted that Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877. The submissions claimed that the proposed increased closure of Claremont level crossing would effectively reduce and limit this right of way and inevitably be subject to legal challenge. They further claimed that the restriction on movement on Howth Road across Claremont crossing to the extent envisaged is a breach of

⁷ Project Appraisal Guidelines Unit 5.2 - Data Collection, PE-PAG-02016 December 2023 Transport Infrastructure Ireland

residents/citizens' rights to freedom of movement as guaranteed in the Universal Declaration of Human Rights, reinforced in the 1992 Maastricht Treaty.

Response to Issue Raised

Claremont level crossing allows for access to a small residential development (Howth Lodge), and eight private properties, with the only means of access to these properties being across the railway line through the level crossing.

Section 2.3.2.1 herein addresses the concerns raised in terms of the level of access. Section 2.3.2.3 herein addresses concerns raised in respect of health and safety risk associated with restricted access for emergency services and Section 2.3.2.4 herein addresses potential increased traffic impacts on the surrounding road network, including Howth Road.

With regard to the issue raised with respect to the legal right of way, the Applicant notes that Section 45 of the Transport (Railway Infrastructure) Act 2001 provides that a railway order, if granted, may authorise the Applicant to *"acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order"*.

It is submitted that there is a need for an increased frequency of train services on the Howth Branch and that the improvement in public transport will be in the best interests of the residents of Howth. It is acknowledged that an increase in rail traffic will increase the amount of time during which the crossings will be closed, although it may be some time before the frequency of service increases from three trains per hour to six trains per hour. As noted above, that frequency already occurs on other rail lines at present and does not create an undue burden for those residents while at the same time, it ensures a high quality of public transport in those areas.

Contrary to the submission that has been made, the Railway Order, if granted, will not interfere with the right of freedom of movement within the State referred to in the Universal Declaration of Human Rights, or the right of free movement between member states of the European Union referred to in the 1992 Maastricht Treaty. In particular, it is not accepted that a restriction on road traffic for short periods could ever constitute an interference with the right of freedom of movement within the meaning of the Universal Declaration of Human Right as alleged or at all.

2.3.2.3 Emergency Services

A number of submissions raised concern around the restricted/reduced level of access across Claremont Level Crossing, when considering emergency services. The submissions note that any reduction in response times poses a significant Health & Safety risk.

Response to Issue Raised

Claremont level crossing allows for access to a small residential development, and eight private properties and access across the railway line is the only access point to these properties, so the concern around emergency service access is fully understood.

The Applicant notes that consultation with representatives from the Emergency Services (Dublin Fire Brigade, which operates the ambulance service in this area) has taken place to ensure that the requirements of these vital services are met by DART+ Coastal North. No issues were raised by the Fire Brigade with regard to the proposals.

It is important to note that there are level crossings across the rail network where emergency services are accommodated without any significant issues on a daily basis. In the event of a level crossing closure, the lane of opposing traffic (to where the queuing takes place) will be empty as a result of a closure, allowing for emergency services to easily bypass queuing traffic and get to the front of the traffic queue, minimising any delays.

The Applicant also notes that in an emergency event, the Emergency Services can contact the Irish Rail Centralised Traffic Control (CTC) in advance, on approaching a level crossing, and ask that the level crossing gates are maintained open or, if closed, opened at the earliest opportunity for them to pass.

2.3.2.4 Potential for traffic queuing to impact on Howth Road

A number of submissions raised concern that the reduced access across the level crossing increases the potential for queuing on Howth Road for vehicles entering Claremont Level Crossing. The submissions note that this presents a further source of traffic delay and congestion at a time when Howth traffic is increasing exponentially.

Response to Issue Raised

In the first instance, as per Chapter 6 Traffic & Transportation of the EIAR, the Applicant notes that the impact assessment approach was in line with standard industry practice and in accordance with TII's Traffic and Transport Assessment Guidelines (2014).

The assessment methodology was consistent with the assessment methodology that was applied for other major transport schemes in the GDA, namely the DART+ West, DART+ South West and the Dublin BusConnects scheme (Section 6.3.3 of Chapter 6).

The National Transport Authority's (NTA) Regional Modelling System (RMS) Eastern Regional Model (ERM) and derived Dublin Local Area Model (DLAM) were used to assess wider impacts of the improvement of the rail service, as is standard industry practice (Section 6.3.3 of Chapter 6).

Traffic surveys were carried out at the R105 Howth Road / Howth Lodge junction, at Claremont Level Crossing from Thursday 11 May 2023 to Wednesday 17 May 2023. The weeklong data confirmed that Thursday 11 May 2023 was a normal representative neutral day, suitable for assessment purposes, in line with the Project Approval Guidelines for National Roads Unit 5.1 on Data Collection published by TII. The traffic impact on the wider road network as a result of the increased level crossing closure at Claremont Level Crossing was assessed using qualitative analysis methods.

It is acknowledged that the Claremont level crossing is the only access point to the Howth Lodge development and the private residences on Claremont Road. Any increase in queuing/delay therefore as a result of increases in frequency and duration of the level crossing closures, could impact on traffic levels in the vicinity, including onto Howth Road.

As detailed above in the response under Section 2.3.2.1, the volume of vehicles crossing Claremont (913) Level Crossing is relatively low. In particular, with respect to the concern raised, surveys have shown only 4 vehicles travelling northbound between 08:00 and 09:00; with 10 vehicles travelling northbound between 17:30 and 18:30 with minimal queueing observed. This is a very low level of traffic, particularly when compared to the approximately 700 to 800 vehicles per hour in both directions at Sutton or Kilbarrack.

It is anticipated that the performance of Claremont Level Crossings will deteriorate slightly for vehicles as the likelihood of vehicles incurring delay at the level crossing will increase due to the increased frequency of level crossing closures here (see response under Section 2.3.2.1 above). However, it is not expected to have a significant impact in terms of queueing due to the low volumes of vehicles that cross at this level crossing.

In particular, the incidence of any impact on the adjacent Howth Road or the regional road network (in terms of queues extending beyond the junction and onto Howth Road) is likely to be infrequent.

The effect on traffic and transportation in terms of general traffic is expected to be negative, moderate, medium-term effect on the whole (Section 6.5.2.4.3 of Chapter 6).

2.3.3 Malahide Marina Village

A number of submissions were received from residents of the Malahide Marina Village complex specifically in relation to the proposed turnback facility at Malahide.

The proposal is for construction of a new turnback facility north of the station, required to improve operational flexibility and support an increase in the frequency of train services.

The Applicant notes in this regard that the original preferred location for the Malahide turnback was to the east of the existing railway located between Malahide Station and the Malahide Viaduct. However, feedback received from various stakeholders following public consultation no.2 (PC2), raised significant concern in respect of this proposal, in particular with respect to the closer proximity of the railway line to properties on the eastern side of the railway and perceived increased visual, noise, vibration and residential amenity impacts, both during the Construction and Operational Phases.

As detailed in Chapter 3 Alternatives of the EIAR (see Section 3.6.1), “as the Project had developed in the intervening period, significant additional information was available, including detailed environmental surveys (most particularly comprehensive biodiversity surveys over a number of years) as well as further design development. This allowed the Project team to consider afresh whether a design option to the west of the railway line could be progressed.

This was directly in response to the feedback received following PC2 and included further consultation with Fingal County Council with respect to any potential conflicts with the Broadmeadow Way, particularly during the Construction Phase. This further information, design development and the outcomes of the consultation with key parties such as Fingal County Council, provided confidence that an alternate option to the west of the railway line could be progressed, without significant effects on either of the designated sites in the vicinity (Malahide Estuary SAC and Malahide Estuary SPA) or the Broadmeadow Way. The result is that the preferred option, as part of the final design for the scheme, for the Malahide Turnback is to the west of the railway line."

The works proposed will introduce a new pocket track between the Up and Down Line located along the southern causeway, in the area between the Strand Road underbridge (UBB29) and the Malahide Viaduct (UBB30) (Image 4-27, Chapter 4). To facilitate the new turnback line the existing corridor needs to be widened to the west above the existing embankment. The works will include the construction of a new modular reinforced earth wall, and a modified earthworks embankment alongside the proposed Broadmeadow Way greenway (Image 4-28, Chapter 4) as described in Section 4.7.4.3.

The existing OHLE and signalling systems will be modified with the installation of new OHLE and signalling assets beginning just south of the viaduct, see Image 4-29 of Chapter 4 in the EIAR.

The most prominent issues raised in submissions relevant to Malahide Marina Village are set out below, while other more submission-specific issues are responded to within the individual submission responses.

2.3.3.1 Landscape and visual amenity

Submissions raised the potential for landscape and visual impacts from the proposed turnback at Malahide. In particular, they raise the potential for impacts on scenic views and visual amenity – linked to both physical infrastructure (proposed section of 3rd Track, raised walkway) as well as the impact of stationary trains.

Submissions raised concern about idling trains blocking light to properties and the impacts from light from the turnback intruding on existing properties.

They also raised the potential impacts of proposed lighting at the turnback location on the Malahide Estuary Special Area of Conservation (SAC).

Response to Issues Raised

As detailed under Section 2.3.3 above, changes were made to the proposed turnback, to address the significant concern and feedback from Malahide Marina residents with respect to the original preferred option in this location. In direct response to feedback received as part of, and following PC2, where concern had been raised about potential impacts on visual amenity, light, noise and vibration and construction effects, the Applicant moved the location

of the turnback from the east of the railway line to the western side of the Southern Causeway, further away from the Malahide Marina area, see figure below.

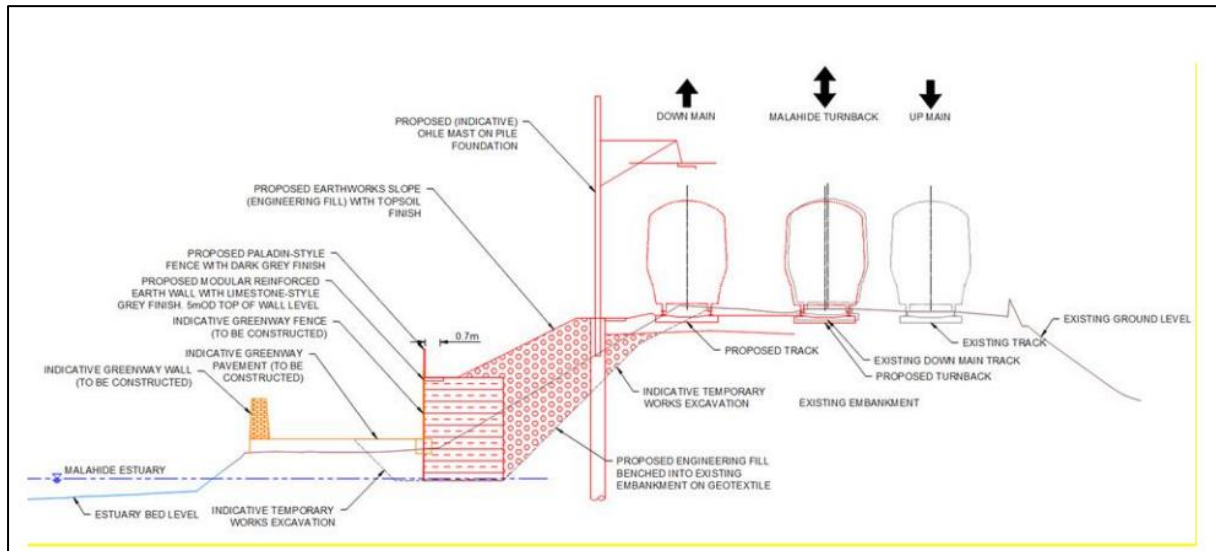


Figure 6 – Schematic showing Proposed Turnback at Malahide

A detailed assessment of the potential effects of the Proposed Development on landscape and visual amenity has been undertaken and is documented in Chapter 15 Landscape and Visual Amenity of the EIAR. This assessment has been undertaken in accordance with best practice guidance and a robust methodology, as detailed in Sections 15.2 and 15.3 of the EIAR.

The assessment of the effects of the works in Malahide are documented in Section 15.5 of the EIAR and includes the following operational phase impact with regard to Zone B: *“The baseline townscape / landscape of Zone B is of medium / high sensitivity. In Zone B the proposals will involve minimal change to the majority of the railway, which is currently electrified. The key changes to the landscape / townscape will be the provision of an upgraded station building at Howth Junction and Donaghmede Station, with new lighting, a new turnback at Clongriffin Station, a new turnback and modular reinforced earth wall on the western side of Malahide Viaduct embankment and OHLE to Malahide Viaduct (UBB30) which is currently not electrified. The proposals will be experienced in the context of an existing operational railway, and they will not alter the existing townscape / landscape character in this zone. The magnitude of change will be low, and the effect in the Operational Phase will be Slight / Moderate, Negative, Long-term.”*

With specific reference to amenity designations, Section 5.5.2.2.5 notes that *“the Proposed Development includes the introduction of a modular reinforced earth wall to the eastern edge of the Broadmeadow Way Greenway, but this will have minimal effect on the visual amenity for users. The materials used for the wall will be different to the natural stone proposed for the greenway but will be sufficiently similar to not impact on the overall visual harmony of views. There will be no impact on the usability of the route. The sensitivity is high. The magnitude of*

change will be low and the effect in the Operational Phase on this amenity designation will be Slight, Neutral, Long-term.”

In terms of preserved views/scenic views, as documented in Section 15.5.2.2.7 of the EIAR, the “proposals to Malahide Viaduct (UBB30) and the adjoining railway embankment will be visible from preserved views at Bissett’s Strand, Malahide (Refer to Photomontage M1 and M2, Figures 15.3.7.2 and 15.3.8.2 in Volume 3B of this EIAR), as well as various preserved views along the shore of Malahide Estuary. The provision of new OHLE masts and modular reinforced earth wall will be apparent, however, the presence of existing OHLE on the section of track south of the viaduct as well as the presence of existing boat masts in the Malahide Marina environs creates a precedent for vertical features in the landscape. In addition, although the estuary has scenic qualities the existing viaduct is of modern utilitarian construction with minimal aesthetic appeal.

The materials used for the proposed modular reinforced earth wall will be different to the natural stone proposed for the greenway but will be sufficiently sensitive to the context to not impact on the overall visual harmony of views. The sensitivity is high and the magnitude of change is medium. The landscape / townscape and visual effect of the Operational Phase on these preserved views will be Slight, Negative, Long-term.”

With specific reference to residential properties, the EIAR (Section 15.5.2.2.2.8) notes the following: “Where views of the proposals to the railway corridor will be seen they will be experienced in the context of an operational railway with existing visible elements and regularly occurring movement and activity. Generally, for residential properties viewing and fronting the proposals, there will be a partial intrusion of the development in the views, possibly with provision of elements that may be prominent but not necessarily uncharacteristic in the context, resulting in change to the composition but not necessarily the character of the view or the visual amenity. For urban, suburban and rural properties viewing and fronting the proposals within the existing railway corridor (excluding those adjacent to key offline proposals) the sensitivity is medium / high and the magnitude of change is medium. The visual effect of the Operational Phase on these properties will be Moderate, Negative, Long-term”.

A suite of mitigation measures is proposed to reduce the potential effects of the Proposed Development. These are detailed in Section 15.6 of the EIAR.

In terms of residual effects, the significant residual effects of the Proposed Development are documented in Table 15-11 of the EIAR. No significant residual effects are predicted for the Malahide turnback area. It is noted that a moderate, negative, long-term effect is predicted to the protected structure, Malahide Railway Viaduct (UBB30) (FCC RPS No.420).

The Applicant also references the photomontages which has been prepared from key or illustrative viewpoints and which are included in Volume 3B of the EIAR. In particular, with reference to the Malahide turnback, the Applicant references Figures 15.3.7.1 through 15.3.17.2.

In terms of light, as shown in the figure above, the infrastructure proposed is further away from the residential area than the existing track layout. No significant effects in terms of light are therefore predicted.

A comprehensive NIS has also been prepared to assess the potential impacts of the proposed development on the conservation objectives on Natura sites, including the Malahide Estuary SAC and SPA. This NIS accompanied the Railway Order application and concluded that, with the implementation of mitigation measures, no significant effects were predicted.

2.3.3.2 Noise and vibration

A number of submissions raised concern about the potential for noise impacts, both during construction (associated with piling and general construction activities) and during operation, from the increased frequency of trains and from those trains turning back at Malahide.

Response to Issues Raised

As detailed under Section 2.3.3 above, changes were made to the proposed turnback, to address the significant concern and feedback from Malahide Marina residents with respect to the original preferred option in this location. In direct response to feedback about impacts on visual amenity, light, noise and vibration and construction effects, the Applicant moved the location of the turnback from the east of the railway line, further away from the Malahide Marina area.

Chapter 14 Noise & Vibration documents the assessment that was undertaken for the Proposed Development in terms of the potential effects of noise and vibration. This assessment was done in accordance with best practice guidance and standards and a robust methodology as detailed in Sections 14.2 and 14.3 of the EIAR.

As detailed in the EIAR, see Section 14.5.1 and Chapter 5 Construction Strategy, in respect of the turnback works, *“the overall duration of construction works is expected to be 18 months with the majority of the works completed during daytime working hours. Off track works such as the construction of the modular reinforced earth wall, and backfilling material will be undertaken during daytime working hours, while other railway works will be undertaken during a small number of single line weekend possessions.”*

It is fully acknowledged in the EIAR (see Section 14.5.1) that the construction of the Malahide turnback has the potential to result in a *“moderate or major impact at residential properties on approximately 125 properties in Marina Village, The Marina, Strand Court, and Bisset’s Strand. The effect at these receptors is likely to be negative, significant to very significant, and short-term. Additionally, there are likely adverse effects on the Malahide Marina Creche, Hi5 afterschool care facility, and Malahide Marina offices. The engineering and possession works are likely to be less than ten or more days or nights in any 15 consecutive days or nights, therefore short-term. The likely effect is negative, not significant, and temporary.”*

Works are also proposed along Malahide Viaduct, to install the OHLE, as described in Chapter 5 Construction Strategy. It is planned that these works will be undertaken over the course of a weekend possession for each gantry. The gantries are located at Pier 3, 6 and 9 of the viaduct. The gantries would be erected during non-disruptive possessions as part of the wider OHLE gantry erection works. Further OHLE support is required at piers 6 and 9. It is planned that these works will be done over weekend possessions along with several weeks of preparatory work in daytime working hours for the gantry foundations. The gantries could then be erected during possessions or engineering hours as part of the wider OHLE gantry erection works.

In this regard, prior to the application of mitigation measures, the EIAR states that *“The engineering and possession works are likely to be less than ten or more days or nights in any 15 consecutive days or nights, therefore short-term. The likely effect of the OHLE support works at piers 3, 6 and 9, is negative, not significant, and temporary due to the separation from the sensitive receptors.”*

A suite of mitigation measures is proposed to reduce the potential effects of the construction work on sensitive receptors. These are set out in Section 14.6.1 of the EIAR and include a wide range of measures including the appointment of a Community Liaison Officer (and a designated noise liaison by the contractor) for the duration of the construction works to ensure that local residents are informed and have a clear conduit for any issues, as well as the preparation of noise management plans and ongoing noise monitoring during construction.

In terms of residual effects during the construction phase, as documented in Section 14.7.1.1, the assessment acknowledges that with the application of mitigation measures, *“the noise effect is expected to be significant at a number of locations within Zone B where major works occur. The resultant residual effects for Zone B will likely be negative, moderate to significant and temporary to short-term.”*

In respect of operational noise, Section 14.5.2.3 sets out the assessment of operational railway noise. As per the methodology set out in Section 14.3 of the EIAR, the following operational noise threshold values have been adopted for the Proposed Development:

- *“Noise impacts at receptors predicted to be subject to noise levels below 55dBLAeq,16hr (daytime) and below 45dBLAeq,8hr (night-time), are assessed as not significant; and*
- *Noise impacts at receptors predicted to be subject to noise levels above 55dBLAeq,16hr (daytime) and above 45dBLAeq,8hr (night-time), are assessed based on the change in noise relative to the baseline.”*

Where operational rail noise levels are above these threshold levels, the effects rating is dependent on the magnitude above the threshold value and the increase above the baseline noise environment. Potential significant effects can occur when the predicted operational noise level is more than 3 dB above the threshold value or Do Minimum level. As stated in the EIAR in relation to train movements at depots, the movement and stabling of trains at the

turnback occur at lower speeds than the main line resulting in noise levels that are estimated to be 10dB to 20dB quieter than the operation of trains on the mainline railway.

Using these criteria and with particular reference to Zone B, where the Malahide turnback works are proposed, as per Section 14.5.2.3, the majority of residential receptors will experience a minor adverse impact from the operational railway noise, as a result of the Proposed Development. As detailed therein, *“there are no residential receptors where a moderate or major adverse impact has been predicted. In line with the proposed methodology, it is therefore concluded that noise impacts upon residential receptors are assessed as not significant.”*

2.3.3.3 Traffic & Transportation

Submissions raised concern about the impact from construction traffic on the Malahide Marina Village and also sought clarification regarding the impacts on the wastewater treatment plant (WwTP) traffic on the Malahide Marina Village (as some of the submissions are concerned that the WwTP traffic will be required to use Marina Village Road during the construction works).

Concerns were raised in relation to the potential for impacts on emergency services resulting from the construction works in the Malahide Marina Village vicinity.

Concern was also raised about the impact of construction compounds on local businesses within Malahide Marina Village and the impact from construction traffic accessing the causeway works.

Response to Issues Raised

As detailed under Section 5.5.3.3 of Chapter 5 Construction Strategy, the following mitigation measures are to be implemented to reduce the impact from construction traffic in and around Malahide Marina Village and its potential effect on the local community:

- Access Management: Construction traffic to and from the compounds will avoid Marina Village Road to prevent interference with Marina Village operations and to ensure that residential and commercial access is maintained without obstruction.
- Traffic Management Plan (TMP): A detailed TMP will be implemented, which includes clear routing of construction vehicles via Old Street (northbound) and James' Terrace (southbound). This plan avoids Marina Village Road and instead directs construction traffic along the designated access routes approved for heavy vehicle movement.
- Scheduling Restrictions: Construction vehicle movements will be restricted to 10 am to 4 pm, avoiding peak commuting hours, school runs, and night-time operations to reduce congestion and disturbance.

Regarding concerns raised with respect to traffic associated with the WwTP, it is detailed in Section 5.3.3.3 that the existing access road to the wastewater treatment plant will be shared with the contractor during construction. This means that traffic associated with the WwTP will not be re-routed to Marina Village Road. Instead, the designated access routes will be clearly

maintained through the R106 and wastewater treatment plant access road. Suitable traffic management measures will be in place to maintain acceptable levels of vehicular access to and from the WwTP, ensuring no adverse impact on its operations or any redirection of traffic through Marina Village.

The TMP for construction traffic, and the CEMP will ensure that the Emergency Services can continue to access all areas within Malahide and Malahide Marina Village during the construction period. No issues are foreseen with regards to Emergency Services access as all construction traffic will be carefully routed and avoids the use of the Malahide Marina Road through the use of the WwTP access road during the construction phase.

The Applicant recognises the importance of local businesses within Malahide Marina Village and their potential concerns about the proximity of construction compounds. The following measures have been incorporated into the Project to mitigate impacts:

- **Compound Location and Function:** The construction compounds have been carefully located to minimise their impact on local businesses. Compounds near the Marina Boatyard will primarily support short-term material storage and logistics for the causeway works.
- **Biodiversity and Seasonal Restrictions:** The use of the compound located south of the Malahide Yacht Club (Sea Road) will be limited to the period between May and September, with strict controls on its activities to avoid long-term disruption.
- **Community Engagement:** The Applicant will continue to engage with local businesses to ensure they are informed of planned activities. This includes timely communication regarding potential short-term impacts, as well as opportunities for feedback to adjust operations where feasible.

Regarding concerns raised with respect to causeway works and construction traffic, it is detailed in Section 5.3.3.3 that the route via Old Street (northbound) and James' Terrace (southbound) has been identified as the most appropriate, balancing the needs of construction logistics with minimising disruption to Malahide Marina Village and other local areas. A high-level swept path analysis confirmed that standard construction vehicles (12m rigid trucks) can be accommodated along the proposed access routes without impacting road safety or operations. Larger vehicles will only be used occasionally and with special traffic management measures (e.g., temporary two-way traffic on James' Terrace) may be implemented to ensure safe and efficient movement of vehicles while minimising public inconvenience.

2.3.3.4 Human Health

A number of submissions raised concern about the impact of the proposed works on elderly and less abled residents who rely on outside space in Malahide Marina Village (which has a large population of older residents).

These submissions also raised concern about the impact of the Proposed Development on quality of life – in particular, from noise & visual impacts during both the both construction and operational phases.

Response to Issues Raised

As detailed under Section 2.3.3 above, changes were made to the proposed turnback, to address the significant concern and feedback from Malahide Marina residents with respect to the original preferred option in this location. In direct response to feedback about impacts on visual amenity, light, noise and vibration and construction effects, the Applicant moved the location of the turnback from the east of the railway line, further away from the Malahide Marina area.

The Applicant acknowledges that the construction of the proposed turnback at Malahide and the installation of the OHLE will impact on the residential amenity of nearby residents during construction. Full details of the proposed works have been included in the Railway Order application and a comprehensive assessment of the potential effects during the construction phase has been undertaken and is presented in the EIAR, which accompanies the Railway Order application.

A response in respect of the potential impacts from noise and vibration and on landscape and visual effects is provided above, in Section 2.3.3.1 and Section 2.3.3.2.

Chapter 7 Population of the EIAR assesses the potential for effects on population, while Chapter 23 Human Health in the EIAR assesses the potential for effects on human health. Both assessments have been prepared in accordance with best practice guidance and standards as set out within those chapters of the EIAR.

In terms of residential amenity, most particularly due to the noise effects, it is acknowledged in Chapter 7 that while the construction stage is temporary, and while the proposed mitigation measures will reduce the effects, the residual effects during construction will be significant.

Chapter 23 Human Health concludes (See Section 23.9.1) that, *with the implementation of the mitigation measures proposed in Chapter 27 (Summary of Mitigation and Monitoring Measures) of this EIAR, no significant residual human health effects are predicted during the Construction Phase.*

In respect of the operational phase, as detailed above, the turnback was moved, in direct response to feedback received from local residents, from the east side of the railway further away from the residents in Malahide Marina.

Again, Chapter 7 of the EIAR assesses the potential impacts on Population. In Section 7.5.4, it notes that *“more frequent services mean more instances of elevated noise with potential effects on residential amenity. However, the noise effects will also be moderated by the electrification itself and use of EMUs when compared with to the use of existing diesel locomotives running at the same speed. Minor adverse impacts on a large number of residential properties, along with a small number of non-residential receptors, are identified in Chapter 14 (Noise and Vibration), with the largest number of properties listed within Zone C. However, these effects are assessed as being not significant following mitigation.”*

2.3.3.5 Need to re-consider Option 5B

Submissions also raised concern about the alternatives assessment carried out for the Proposed Development and expressed a clear preference for Option 5b, which had been considered as part of the comparative assessment of options. 5b option has some comparative advantage over Options 2a and 2b as there is less loss of trees and hedgerows and less visual impact for properties east of the railway.

Submissions noted, that, regarding noise and vibration, Option 5b is not near sensitive receptors for construction or operational noise making this a more attractive option for noise and vibration.

Submissions also noted that under the criterion Transport Integration, Option 5b has no significant long-term impact on other existing transport systems.

The submissions also noted in this regard that homeowner's welfare was being considered secondary to both environmental welfare and train driver welfare.

Response to Issues Raised

In respect of the works proposed at Malahide, a detailed assessment of options was undertaken, prior to the identification of the preferred option. This assessment is described in Chapter 3 Alternatives in the EIAR, and in Section 3.5.4 in particular. As detailed in Section 3.3.4, the assessment methodology was based on "Guidelines on a Common Appraisal Framework for Transport Projects and Programmes" (CAF) published by the Department of Transport, Tourism, and Sport (DTTAS), March 2016 (updated 2020), TII's Project Management Guidelines (TII PMG 2019) and the NTA's Project Approval Guidelines 2020⁸.

As set out in Section 3.4, the process comprises of a two-stage approach, as appropriate:

- Stage 1 – Preliminary Appraisal (sifting) of a long list of options; and
- Stage 2 – Multi-Criteria Analysis (MCA) of a shorter list of feasible options.

The assessment also takes account of the requirements of Article 5(d) of the EIA Directive, which has been transposed into Irish law by Section 39 of the 2001 Act as inserted by Section 49(b) of the Planning and Development (Strategic Infrastructure) Act 2006 and as amended and substituted by the European Union (Railway Orders) (Environmental Impact Assessment) (Amendment) Regulations 2021 (S.I. No. 743/2021) which *inter alia* provides that:

"The Applicant shall ensure that an environmental impact assessment report-....."

⁸ The CAF was replaced by the Transport Appraisal Framework (TAF) in June 2023 but was the relevant guidance in place at the time of the options assessment.

...(b)(v) a description of the reasonable alternatives studied by the Applicant which are relevant to the proposed railway works and their specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the railway works on the environment;.....”

A total of 16 options were developed for the Malahide area, with 5 of these options passing the preliminary sifting and brought forward for more detailed multi-criteria assessment. This included four options south of the Malahide viaduct (Options 1A, 1B, 2A, 2B) and one option north of the viaduct (Option 5B).

The summary findings of the MCA represented in Table 3-35 of Chapter 3 of the EIAR and more details are provided in Appendix A3.3 (Preliminary Options Selection Report – Main Report) and A3.4 (OSR – Volume 1 – Preferred Option Report) of the EIAR.

As detailed therein, Option 2B was identified as the preferred option for a turnback at Malahide.

It is acknowledged, as referenced in the submissions, that in terms of transport integration, Option 5B is more favourable than Option 2B. Likewise, in respect of noise and vibration, Option 5B is more favourable than Option 2B.

However, under environmental and economy criteria in particular, Option 5B was considered less favourable than Option 2B and specifically in respect of the following sub-criteria of each:

1. Environmental Sub-Criteria

- **Archaeology, Architectural and Cultural Heritage** – the comparative assessment concluded that there is some archaeological potential in the vicinity of Option 5B. Furthermore, this option includes for widening an existing bridge to the north of the Malahide Estuary. While a detailed assessment had not been undertaken at the time of the MCA, the bridge is potentially of architectural heritage interest, and it was anticipated that the proposed widening would have a significant negative impact on the fabric and setting of what is potentially a historic structure.
- **Biodiversity** (including Appropriate Assessment considerations) - Option 5B includes modifications to the railway bridge structure over the River Pill which drains to the Malahide estuary. The comparative assessment concluded that these modifications could involve works affecting the adjacent intertidal habitats which on the eastern side fall within the Malahide Estuary SAC, and on the western site fall outside of any designation but nonetheless are likely to comprise Annex I habitat types. These impacts on habitats could be both direct (i.e. works directly removing/impacting on habitat within the works footprint) and indirect (e.g. construction stage impacts on water quality or removing/altering the non-return flap valve which could either permanently or temporarily alter hydrological flow/morphology which define the intertidal habitats). Depending on whether the structure has potential to support bats, works to this structure could also impact on bats
- **Water Resources** - Option 5B requires bridge widening over the River Pill. The new bridge has the potential to impact the flow regime and water quality in the watercourse

and result in impacts with regards to flooding and the downstream water dependant SAC. While the comparative assessment concluded that these concerns could be mitigated through design, it was comparatively less favourable than Option 2B.

- **Geology and Soils** - In Option 5B, it was envisaged that the existing railway bridge over the river would need to be widened and therefore, soft ground associated with the estuary will be encountered. Hence Option 5B was comparatively less favourable than Option 5B.

2. Economy Sub-Criteria

- **CAPEX** – Option 5B required potential modification to an existing bridge and may also require a structure associated with the existing level crossing nearby. The existing bridge carries the rail over a 2-span masonry arch tidal overflow. This option is considered to have a comparative disadvantage when compared to Option 2B, which has no proposed impact on existing structures.
- **OPEX** – Option 5B has the longest ECS (Empty Coaching Stock movement) with an extra 4km of empty train running for two trains per hour turning back. This option therefore has a significant comparative disadvantage.
- **Train operations** - Option 5B has a longer ECS move which could reduce turnaround time and impact performance, hence it was comparatively less favourable than Option 2B.

As a result of the above, Option 2B was assessed as being comparatively more favourable than Option 5B (and the other shortlisted options) and was identified as the preferred option.

As detailed herein, feedback received from various stakeholders following public consultation no.2 (PC2), raised significant concern in respect of Option 2B, in particular with respect to the closer proximity of the railway line to properties on the eastern side of the railway and perceived increased visual, noise, vibration and residential amenity impacts, both during the Construction and Operational Phases.

As detailed in Chapter 3 Alternatives of the EIAR (see Section 3.6.1), “as the Project had developed in the intervening period, significant additional information was available, including detailed environmental surveys (most particularly comprehensive biodiversity surveys over a number of years) as well as further design development. This allowed the Project team to consider afresh whether a design option to the west of the railway line could be progressed. This was directly in response to the feedback received following PC2 and included further consultation with Fingal County Council with respect to any potential conflicts with the Broadmeadow Way, particularly during the Construction Phase. This further information, design development and the outcomes of the consultation with key parties such as Fingal County Council, provided confidence that an alternate option to the west of the railway line could be progressed, without significant effects on either of the designated sites in the vicinity (Malahide Estuary SAC and Malahide Estuary SPA) or the Broadmeadow Way. The result is that the preferred option, as part of the final design for the scheme, for the Malahide Turnback is to the west of the railway line.”

3. RESPONSE TO SUBMISSIONS FROM PLANNING AUTHORITIES

3.1 SB0049 – Dublin City Council (DCC)

Dublin City Council has made a submission with comments from various internal departments/divisions including the Environment and Transportation Department, Conservation & Heritage Division, Housing Department, Archaeology Division, City Architects, and the Development Management Division including the Air Quality Monitoring & Noise Control Unit.

The Environment & Transport Department had comments in relation to stations, interactions with other infrastructure projects, interaction with private developers, pedestrian and cycling infrastructure, substations and temporary compounds, construction & traffic management, public lighting, surface water management & drainage, EIAR noise & vibration, and continuing liaison.

The issues raised in the submission are addressed below:

1. Summary of Issue Raised

The Dublin City Council (DCC) submission notes that *“DCC supports the Project and recognises the significant improvements it will bring to public transport serving the central and northeast part of the City. The Project is considered to deliver a much-needed high quality, high-frequency public transport option and will modernise and improve the existing rail services in the GDA, providing a range of benefits for both the residents of the GDA itself and those in surrounding regions.*

From a strategic point of view, the Project will contribute to meeting the objectives of the National Planning Framework (NPF) and Climate Action Plan (CAP) through the provision of high-quality integrated public transport services, which will support growing communities, businesses, and future development, and by reducing carbon emissions through the deployment of new electric trains. Delivery of the DART+ Coastal North Project will support existing communities along the railway and support future sustainable development.”

Response to Issue Raised

The Applicant notes and welcomes DCC’s submission in this regard.

2. Summary of Issue Raised

The DCC submission notes relevant national, regional and local policy with which the proposed DART+ Coastal North Project aligns. It also notes in respect of the Dublin City Development Plan, that this *“includes a series of Strategic Development and Regeneration Areas (SDRAs), areas identified as having the capacity to deliver significant regeneration. This includes SDRA 1, Clongriffin/Belrnanne and Environs, which incorporates the Clongriffin rail*

station. Opportunities to improve the pedestrian and cycle connectivity to the station and the public realm should be explored by the Project.”

Response to Issue Raised

Works to improve pedestrian and cycle connectivity to the station and the public realm are not included in the DART+ Coastal North Project (save for Howth Junction & Donaghmede Station, where in direct response to significant feedback from public consultation, significant upgrades are proposed to develop the station to better serve as an interchange station into the future and in so doing, improve passenger experience generally). However, as detailed in the EIAR, Chapter 26 Cumulative Effects (Table 26-6 Cumulative Assessment of DART+ Coastal North with Other projects), there are other parallel projects which are looking at these aspects.

As detailed within the above referenced table, at the time of the Railway Order submission, the DART Station Enhancement Project *“is appointing consultant services to review the future requirements at DART stations. The objective of the Project initially is to produce a study that will recommend how DART stations (current and proposed network) should be enhanced into the future to provide an improved customer experience, whilst also considering the increasing passenger demand capacity challenges that will be introduced in the future. It will outline the most effective method to enhance DART stations into the future considering the provision of increased services under the DART+ Programme and all other ongoing projects/programmes with an aim of making DART stations more attractive to the customer. The early elements of this Project (focussing mainly on capacity issues associated with future passenger numbers) will be progressed in 2024, and subject to funding will be progressed thereafter”*.

In the same table in the EIAR, reference is made to the Multimodal Interchange Project, which will *“assess all stations throughout the network with a view to implementing its strategy at stations where there is a need for modifications that will have an impact on multimodal travel and station access. The Project aims to improve the integration and accessibility of the public transport network for stations and communities across the network, through the provision of multimodal interchanges. This Project will assess a variety of multimodal options at stations including but not limited to the provision of secure bicycle parking and shared mobility services. The Strategy relating to this Project was completed in 2023 and is currently with the NTA for review and approval. Subject to approval and funding the Project will move to the next phase and eventual delivery of the solutions identified.”*

It is anticipated that both of these projects will provide an improved passenger experience and greater functionality and connectivity to provide more sustainable transport and thereby reduce carbon footprints.

3. Summary of Issue Raised

In respect of the NIS that accompanied the RO application, the DCC submission *“considers that the submitted NIS is generally satisfactory in terms of identifying the relevant Natura 2000 sites and the potential adverse impacts on the integrity of their conservation objectives. The*

avoidance, design requirements and mitigation measures set out in the NIS to ensure that any impacts on the conservation objectives of European Sites will be avoided during the construction and operation stages will ensure that there will be no adverse effects on any European sites.”

Response to Issue Raised

The Applicant notes and welcomes DCC’s views in this regard.

4. Summary of Issue Raised

In respect of zoning, the DCC submission notes *“that the secondary elements/structures associated with the Project fall within the definition of public service installation. Overall, it is considered that the Project would be compatible and consistent with the various zoning objectives for the area.”*

Response to Issue Raised

The Applicant notes that in this regard, DCC considers that the Project is compatible and consistent with the various zoning objectives for the area.

5. Summary of Issue Raised

The DCC submission notes in respect of amenity impacts, that *“it is satisfied that, subject to appropriate amenity safeguards, and the application of appropriate conditions, the elements of the Proposed Development which fall within the DCC functional area will not have any excessive or undue impact on the amenities of the area. DCC considers that whilst there will be a degree of disruption during the construction phase, there is unlikely to be an unduly adverse impact on amenities provided appropriate amenity safeguards are in place.”*

Response to Issue Raised

The Applicant notes and welcomes DCC’s conclusions in this regard.

6. Summary of Issue Raised

With regards to Strategic Planning and in respect of the continuation of the direct service from Howth, DCC notes in its submission that, *“from an engineering perspective, the proposed works can support the continuation of a direct service from Howth to the City Centre. Reducing this service could lead to a shift away from DART usage, as a shuttle service would introduce inconvenience and additional travel time due to the need for interchange. DCC therefore recommends that Irish Rail maintain a level of direct service between Howth and the City Centre (and vice versa). This commitment will ensure the continued attractiveness of rail services for passengers using the Howth, Sutton, and Bayside rail stations”.*

DCC also recommends in its submission that *“consideration is given to the creation and expansion of mobility hubs and provision of shared mobility services for interchange at key stations to facilitate ease of access and transition between transport modes. This will require*

engagement with other public transport and shared mobility providers. Clongriffin station is identified as a key shared mobility hub as it has an existing interchange with Dublin Bus and potential for improved mobility connectivity options”.

DCC also notes that *“there are locations where [other infrastructure] projects overlap and will be required to take cognisance of one another e.g. Metrolink and Bus Connects. Coordination of timelines and phasing at the implementation stage will be important.”* It also states further on in the submission that a Strategic Citywide Traffic Plan may be needed to ensure the parallel projects can be constructed without significant effects on traffic. It notes that *“continual liaison through regular meetings will be required between DCC, Irish Rail and appointed contractors.”*

Response to Issue Raised

In respect of the first point, the Applicant notes that the DART+ Coastal North Project proposals will result in a greatly enhanced level of service on both the Northern Line and Howth Branch. The primary objective of the DART+ Coastal North Project is to deliver the infrastructure required to enable this. As detailed within the Railway Order application, (see in particular Chapter 4 Description of the Proposed Development in the EIAR), the DART+ Coastal North Project will, if the Railway Order is granted, *“deliver an improved and extended electrified rail network and will enable increased passenger capacity and an enhanced train service between Dublin City Centre and Drogheda, including the Howth Branch.”*

To support this objective, the Proposed Development will seek a reconfiguration of Howth Junction & Donaghmede Station and the removal of train crossing conflicts at the station. These conflicts currently limit Iarnród Éireann’s ability to increase capacity and enhance services on the Northern Line and Howth Branch. As detailed in Section 4.11.1 of Chapter 4 of the EIAR, *“Proposed changes to the Howth Branch...would enable a direct line service between Howth and Dublin City Centre and/or a DART shuttle service between Howth Junction and Donaghmede and Howth Stations.”*

The Applicant would like to make clear that the enhancement of the service on the Howth Branch will include a combination of a direct service to the city centre and a DART shuttle service between Howth and Howth Junction & Donaghmede Station.

However, the capacity of the Northern Line (south of Howth Junction) into Connolly Station is 12 trains per hour, and these 12 trains per hour need to be shared between the Howth Branch and the Northern Lines. In order to increase train frequency to 12 trains per hour at peak periods on the Northern Line north of Howth Junction, it will be necessary to run a DART shuttle service on the Howth Branch.

The Project also proposes to significantly enhance the service on the Howth Branch from 3 trains per hour to 6 trains per hour during peak periods. This allows for the capacity and frequency of DART+ services on both the Northern Line and Howth Branch to be maximised.

When future passenger demand warrants the operation of a DART Shuttle Service on the Howth Branch, passengers travelling to/from Dublin City Centre will be required to interchange between services at Howth Junction and Donaghmede Station. It is important to note that the operation of a DART shuttle service is not something that would come into effect immediately upon the delivery of the DART+ Coastal North Project. It is envisaged that shuttle services would operate at peak times with direct services being maintained at off-peak and weekends.

The Applicant has been clear, throughout the non-statutory public consultation process and in the application documentation that, while the Proposed Development seeks to make the infrastructural changes which would enable these operational changes, the implementation of these operational changes is not part of the DART+ Coastal North Project.

Following completion of the Project, there will be different phases of timetable development that will be gradually introduced as the passenger demand grows towards the maximum level of service. Once DART+ Coastal North is complete (if consented) and as demand increases, the operational detail will be worked through, with these operational changes likely made on a phased basis.

Any substantial timetable change, such as the introduction of a shuttle service, will go through a Public Consultation process of its own organised by the National Transport Authority (NTA) known as the Timetable Customer Consultation Process.

In respect of the creation and expansion of mobility hubs and shared mobility services for interchanges at key stations (including Clongriffin), the Applicant would point to the response given under Point 2 above.

Finally, in respect of other parallel projects such as Metrolink and BusConnects, where construction phases may overlap with DART+ Coastal North, this has been considered fully in the EIAR, in particular in Chapter 26 Cumulative Effects. It is fully acknowledged by the Applicant that close collaboration between the proponents of these projects, their appointed contractors and the relevant Authorities, including Dublin City Council is required to ensure that significant effects on traffic are avoided or minimised to the extent possible. A detailed CEMP, which includes a Construction Traffic Management Plan (CTMP) has been developed and is included in Appendix A5.1 of the EIAR. This will be developed further by the Contractor prior to construction, in consultation with the relevant authorities, including Dublin City Council.

7. Summary of Issue Raised

With regard to Environment and Transportation, DCC in its submission acknowledges the proactive engagement which has taken place to date between DCC and Irish Rail on this Project. The submission includes a number of comments (see below) and welcomes further opportunity to engage at the detailed design and construction stage. A set of standard conditions are also included in Appendix A of the DCC submission.

- a) Extensive works are proposed at Howth Junction and Donaghmede Station. Important considerations in the design of the stations are ease of interchange and security within

and around stations. The stations must be safe and attractive in the context of required interchange on the Howth line.

- b) In respect of the integration of land use and transportation at station sites, DCC comments that *“while not applying for this development as part of the RO application, Irish Rail should collaborate closely with relevant stakeholders to ensure that the design of stations and surrounding public realm has taken cognisance of potential future development above. Stations should be future proofed structurally so that the delivery of the stations will not preclude future high-quality development on the sites.”*
- c) In respect of pedestrian and cyclist infrastructure, the DCC submission notes that *“there does not appear to be provision for lockers, similar to the existing bicycle parking provision. This should be explored at detailed design / operational phase”* and that this should be done in accordance with all relevant best practice standards.
- d) The submission notes that *“access arrangements and final layouts of all proposed substations within the DCC area should be agreed with DCC”* and that *“careful consideration should be given to the design and management of proposed compounds located and accessed from within residential areas”*.
- e) In respect of public lighting, the submission notes the requirement to ensure all public lighting accords with both DCC and ESB (where attached to ESB Networks infrastructure) requirements as well as appropriate design standards. The submission also notes that *“where the works are being carried out along routes that remain open to the public, then the route must be lighted at all times, including during nighttime hours.”*
- f) In respect of surface water drainage, the submission notes that *“all surface water designs should be submitted for written approval well in advance of commencement of construction work”* and that it should *“comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0”*. The submission notes that *“discharge to public sewers is avoided whenever possible”* and that the design is in accordance with the *“DCC Sustainable Drainage Design & Evaluation Guide 2021”*. SuDS should be implemented and any discharge to public sewers shall be limited to 2l/s/ha.
- g) The submission notes that given the nature of the development, the risk of flooding from all sources needs to be carefully considered and should be assessed in accordance with the OPW Planning System and Flood Risk Management Guidelines and the Dublin City Development Plan – Strategic Flood Risk Assessment (SFRA).

Response to Issue Raised

In respect of the proposed conditions, the Applicant notes that these are addressed in Section 3.1.1 later in this report.

The Applicant has responded to each of the above issues in turn below:

- a) The Applicant has listened carefully to the concerns of DART users along the Howth Branch line in this regard and has responded directly to this concern and a variety of significant modification works are now proposed, as detailed in Section 4.7.3.1 of the EIAR, to *“both improve the passenger experience generally and to develop the station to better serve as an interchange station.”* As detailed therein, *“the station works will also involve modifications to the station entrances to provide a more accessible, user friendly and customer focussed station for Donaghmede and Kilbarrack. Upgrades are*

proposed to the station footbridge and connections to the centre platforms, as well as to the lighting, CCTV system, signage and finishes throughout. The improvement at the Donaghmede entrance will also provide direct access to Platform 4 and connectivity via the footbridge.” The interchange at Howth Junction & Donaghmede station will also be facilitated by an increase in Northern Line stopping trains which will minimise wait times for connecting services.

- b) In respect of the integration of land use and transportation at stations, the Applicant notes the comments from DCC, which it acknowledges do not relate to the DART+ Coastal North Project. The Applicant is committed to working with all relevant stakeholders in this regard.
- c) In this respect, the Applicant would refer to the response provided under Point 2 above. The Applicant also notes that, while the proposed upgrade to Howth Junction & Donaghmede Station is to improve passenger experience and better prepare the station to act as an interchange station, provision has been made below the stairs in the station entrances, for secure bike storage to be provided for passengers to encourage active travel and give a direct link from the bike storage into the station.
- d) With respect to access arrangements and final layout of the proposed substations within the DCC area, the Applicant notes that no substations are proposed within the DCC area.
- e) With respect to public lighting the Applicant has noted the recommendations of Dublin City Council and has no objection to meeting these requirements.
- f) In respect of drainage, the Applicant has noted the recommendations of Dublin City Council and has no objection to meeting these requirements.
- g) In respect of flooding, the Applicant notes that a site-specific flood risk assessment has been prepared for the DART+ Coastal North Project and has been included with the Railway Order application documentation. This FRA has been carried out in accordance with the OPW Planning System and Flood Risk Management Guidelines and with cognisance of the SFRA for Dublin City Development Plan 2022-2028.

8. Summary of Issue Raised

With regard to EIAR Noise & Vibration, the submission from DCC notes the following:

In respect of the Dublin Agglomeration, Environmental Noise Action Plan 2018 – 2023, the noise action plan for Round 4 commenced in April 2023 (not 2024 as noted in the EIAR) and the Round 4 Dublin Agglomeration Noise Action Plan 2024 – 2028 has now been completed and is available at the following link: <https://www.dublincity.ie/residential/environment/role-air-quality-monitoring-and-noisecontrol-unit/dublin-city-noise-maps>. The submission also states that *“the EIAR notes that the sources of information and data used to support the assessment included noise and vibration surveys undertaken in 2023 as well as the Round 3 strategic noise maps. It should be noted that the Round 4 strategic noise maps, were completed by December 2022.”*

“The DART+ Programme should help to contribute to reduced noise levels through enhanced electrification and increased capacity of the network, which may help to reduce road traffic

volumes. In this regard, DCC fully supports the implementation of the Project. Furthermore, DCC wishes to acknowledge the constructive and collaborative cooperation which the council has had with Iarnród Éireann over the years in respect of managing rail related noise issues and more recently during the preparation of the Strategic Noise Maps and Noise Action Plan for the Dublin Agglomeration under Round 4 of the Environmental Noise Regulations.”

In respect of construction noise and the Clasac music centre in particular, the DCC submission recommends that “Iarnród Éireann consult with the centre to confirm the noise control measures within the building and co-ordinate activities particularly during the construction phase.”

In respect of operational noise, the DCC submission notes that:

3. no baseline noise monitoring was undertaken within Zone A and “suggests that some measurements along this length to confirm the existing baseline, and verify the model developed for assessment of operational changes against that baseline, would have been useful”

The submission also references the following: “Section 14.5.2.2 of the EIAR sets out the railway model validation and suggests that the Do Minimum predicted levels are compared against the measured noise levels. It is not clear why Do Minimum, which relates to 10 years in the future, would be compared with measured data in 2023 and not the Do-Nothing Scenario. Indeed, the last sentence of the 1st paragraph suggests that the “measured and predicted Do Nothing daytime sound levels at these locations are shown in Table 14-15”. However, Table 14-15 relates to “Zone A works – impact distances”. It is assumed that the Do-Nothing scenario has been used for validation, as presented in Table 14-41, and issues mentioned above are in error.”

- Further, in respect of operational noise, the submission notes that: “Table 14.42 of the EIAR suggests that, in Zone A, 1712 residential receptors (assumed to be buildings) are subject to noise levels above either of the two thresholds mentioned. The EIAR reports that the impact of the change for the Do Something scenario is Negligible which suggests that the change from the Do-Nothing scenario is less than 1dB (inferred from Table 14-8 of the EIAR). No modelling results are presented within the EIAR which confirm the modelled noise levels along Zone A for the Do-Nothing scenario and how these might change for the Do Something scenario.” The submission does go on to say that: “Notwithstanding this, and on the assumption that the change inferred above is correct, DCC welcomes the fact that the proposed Do Something scenario is predicted to have such a negligible increase in operational railway noise levels within Zone A.”
- The submission goes on to note that the assessment focusses on the change in noise between the proposed scheme to the existing baseline environment but notes that this existing baseline environment may already result in noise levels which are above recommended thresholds (i.e. Environmental Noise Directive, WHO guidelines). In this regard, it notes that “DCC would welcome the opportunity to work with Iarnród Éireann to consider the following under the Project or separately;

- *The completion of additional noise monitoring locations along Zone A and particularly within PIA9,*
- *The evaluation of measures that could be considered to reduce environmental noise levels to more acceptable levels along Zone A and particularly within PIA9.”*

Finally, the submission recommends (given the complexity of the issues) that: *“an Irish Rail/DCC Project Liaison Office with multi-disciplinary input be established. Continual ongoing engagement will be required regarding construction traffic management, licenses, agreements and other matters etc.”*

Later in the submission, in respect of development management, the following is also noted: *“Regarding nighttime works, a Noise Management Plan for the Project should be furnished to DCC for review before any nighttime works commence. The noise management plan should be sent to the Air Quality Monitoring & Noise Control Unit for review before works commence. This plan should establish those who may be affected by certain works and the procedures to mitigate the noise exposure levels etc. Previous NMPs established those at risk from nighttime works and procedures to mitigate and address the issues were provided. Residents living within a certain distance from the works were notified of upcoming nighttime works”.*

Response to Issue Raised

The Applicant notes and welcomes DCC’s comments with regard to the collaborative approach taken by Iarnród Éireann and the Council in respect of managing rail related noise issues and more recently during the preparation of the Strategic Noise Maps and Noise Action Plan for the Dublin Agglomeration under Round 4 of the Environmental Noise Regulations.

In respect of the issues raised with regard to construction noise and vibration, Appendix A5.1 in Volume 4 of the EIAR sets out the Construction Environmental Management Plan (CEMP) for the Proposed Development. It includes the approach to manage, mitigate and monitor noise and vibration during the Construction Phase. Specific working hours and mitigation measures at identified sensitive locations will be included in a Noise and Vibration Management and Control Plan by the contractor and will consider DCC guidance in this regard. As detailed in the CEMP, the plan will be further developed by the Contractor in consultation with the planning authorities, prior to the commencement of construction.

In respect of the Clasac music centre, the Applicant notes that this music centre is across the track from the Fairview Depot on the Alfie Byrne Road. The Applicant would note that only minor works are proposed at the Depot. Further, as detailed within Chapter 14 Noise & Vibration of the EIAR, Section 14.6.1 a suite of mitigation measures are proposed during the construction phase, including:

During the course of construction, the procedures outlined in Iarnród Éireann operation procedure CCE-QMS-008-002 Noise Management – CCE Activities as well as the DCC GPG

(DCC 2016) will be implemented. The Iarnród Éireann and DCC documents include the following noise mitigation measures:

1. The Community Liaison Officer (or other nominated person) will notify affected residents in advance of any planned works commencing with a letter drop in the relevant area.
2. Where planned work occurs over a 72hr weekend shutdown there will be a noise management plan submitted to the local authority in advance.
3. The following measures will be implemented where feasible during construction activities:
 - a. Carry out as much preparatory work in daylight as practicable (for example, pre-sawing or drilling rails).
 - b. Inspect the worksite in daylight if practicable and look for the best location to position generators, which maximises existing screening.
 - c. Position generators and lighting away from residential dwellings.
 - d. Take advantage of natural barriers such as vegetation, walls or embankments that can offer noise screening to adjacent neighbours.
 - e. Where necessary, use noise attenuation screens. The screens must be located as close to the receiver or source as possible.
 - f. Consider using additional supply cables and structures so that the generators can be positioned as far away from housing as practicable.
 - g. Where possible, use low-noise plant. Any unsuitable plant should be replaced by higher quality low noise plant or contained by the use of mufflers/silencers.
 - h. Do not leave equipment or vehicles running/idling unnecessarily.
 - i. Do not shout work instructions when working in residential areas at night unless absolutely necessary.
 - j. Plan effectively to ensure timely deliveries of materials. consultation with stakeholders will continue throughout the Project.

In respect of communication with neighbours (which would include the Clasac Music Centre), Section 14.6.1.1 provides that “the Contractor will be proactive in engaging with the occupants of neighbouring properties in relation to individual and particular concerns that may arise and will notify them of any works forecast to generate appreciable levels of noise, explaining the nature and duration of the works.

A designated noise liaison will be appointed by the contractor for the duration of the construction works. This person will log any issues and follow up in a prompt fashion. Night-works in particular have the potential to generate the most significant noise effects. All affected sensitive locations will be notified of planned works in advance of the works progressing. The notification will include a description of the works, the expected duration and details of how to contact the contractor to log complaints.”

Noise and vibration monitoring, audits and a host of other mitigation measures are included in Section 14.6.1 of the EIAR.

It is correct that the assessment reports that the likely operational noise impact in Zone A is 'Negligible' with a total of 1712 residential properties likely to experience less than a 1dB noise change. As described in section 14.5.2.3, this noise change is calculated for the 'Do Something' scenario compared to the 'Do-Minimum' scenario. The 'Do-Nothing' scenario is not used to determine the noise impact and is not reported separately.

The strategic noise maps were used to support the assessment by comparing predicted levels to the operational noise model for the assessment. The Round 4 strategic noise maps provide a good match to the operational noise model. It is correct that the 'Do-Nothing' scenario has been used to perform a validation of the operational noise model and reference to 'Do-Minimum' in Section 14.5.2.2 is made in error.

As described in Section 14.4, baseline noise monitoring was conducted near sensitive properties that have the potential to be impacted by noise. Since the Proposed Development is likely to result in a negligible noise impact in Zone A, the strategic noise maps and operational noise model of the Do-Nothing Scenario have been considered sufficient to define the baseline noise climate for the receiving environment in this area.

Although the Proposed Development is likely to result in a negligible noise increase in Zone A, Iarnród Éireann would continue the constructive and collaborative cooperation with DCC including consideration of noise monitoring and management within Zone A.

9. Summary of Issue Raised

With regard to Conservation and Heritage and in respect of General Linear Works, the submission requests that: *"Heritage assets such as Protected Structures, buildings identified on the NIAH, buildings identified on the DCIHR, Architectural Conservation Areas (ACA's) and Conservation Areas that are affected by the above works should be identified and denoted on all drawings and should be listed/described within the HIAR. IE are requested to engage with the Conservation Section of DCC and shall ensure that project impacts are continuously monitored by the design team in such a way as to inform the design and mitigate against any adverse impacts on architectural heritage during rather than after the design process."*

In respect of Fairview Depot, the submission notes that: *"Fairview Depot is a modern complex along the railway line. The Conservation and Heritage Division finds that there would be no impact to architectural heritage by the proposed works to the Depot."*

The submission concludes, in this regard that: *"It is concluded by the Conservation and Heritage Division that due to the limited works proposed within Zone A of the railway, there will be no impact on the built heritage structures identified within the impact assessment. The Conservation and Heritage Division are satisfied with the quality of the submitted Architectural Heritage Impact Assessment."*

Response to Issue Raised

The Applicant notes and welcomes DCC's conclusions in this regard. In respect of ongoing engagement with the Conservation Section of DCC, the Applicant will continue to engage with DCC throughout the Project, as required.

10. Summary of Issue Raised

In respect of archaeology, the submission states that *"the Archaeology Section concurs with the archaeological mitigation outlined in the EIAR."*

The submission also includes the following recommendations, all of which are included in the recommended conditions for An Bord Pleanála to consider, should it be minded granting permission for the Proposed Development:

The appointment of a Project Archaeologist is strongly recommended to ensure the successful delivery of the EIAR recommendations. The DCC Archaeology Section concurs with the proposed methodology for archaeological mitigation as outlined in the EIAR and recommends it be implemented in full.

If any archaeological material is discovered within the Dublin City Council area, the City Archaeologist the National Monuments Service, Dept. of Housing, Heritage and Local Government and the National Museum of Ireland should be notified immediately.

All archaeological mitigation shall adhere to the archaeological policies, objectives and standards of the Dublin City Development Plan 2022-28.

All archaeological mitigation for the scheme shall comply with national policy and best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.

Should archaeological excavation be required in the Dublin City Council area, the primary archaeological paper and digital archive should be prepared and deposited with the Dublin City Archaeological Archives in a timeframe and format agreed with the planning authority

A strategy for the dissemination/publication of any archaeological reports and information generated as a result of the Dart + Coastal North Project should be developed and implemented by the Project archaeologist with agreement of the planning authority Archaeologist

Response to Issue Raised

In the first instance, the Applicant notes and welcomes the submission which states that *"the Archaeology Section concurs with the archaeological mitigation outlined in the EIAR."*

In respect of the recommended conditions, the Applicant refers to its response to each of these conditions in Section 3.1.1 below.

11. Summary of Issue Raised

The DCC submission notes the following general comments from the City Architect:

- a) *"It is understood that the majority of works will take place within the existing rail corridor, However, the Projected increase in passenger numbers will have impacts on the public realm around existing station entrances in the form of increased footfall. Studies of existing footpath widths, bike parking provisions etc. should be carried out to identify locations of potential shortcomings and where public realm upgrades will be required"*
- b) *Details to be provided in relation to the Percent for Art scheme requirements and how artworks will be integrated into the public realm*
- c) *Details of the treatment of parapets and the Project design at the structures of heritage importance and across the Project are required*
- d) *Access for all passengers should be treated with equal importance in accordance with universal design principles. A Universal Access Audit on the design demonstrating how equal access for all users is being delivered should be prepared*
- e) *The proposal to improve the station is welcome and the design should be developed to fully integrate into the surrounding area and include: - public realm enhancements around the station entrances to provide safe, well-lit, open and inviting arrival points - high-quality finishes and architectural detailing to the public realm and the buildings - fully universally accessible station with lifts - additional greening and SuDS measures - additional secure cycle parking"*

Other more specific points are also raised as follows:

- f) *"Site plan drawings lack sufficient detail to allow a thorough assessment of the impact of new Dart+ Coastal North elements on the public realm adjacent to stations and the surrounding DCC roads and streets.*
- g) *Photomontage images lack sufficient detail to allow a thorough assessment of the impact of new Dart+ Coastal North elements on the public realm adjacent to stations and the surrounding DCC roads and streets.*
- h) *A statement regarding the Public Realm Strategy is made on page 79 of EIAR Vol 2 - Chapter 1 5 Landscape & Visual. However, there are no developed drawings or images included in the package that clearly demonstrate final public realm designs.*
- i) *Depictions of new public space as presented in the photomontages indicate extensive, unanimated hardscape. In line with the Dublin City Climate Action Plan, DCC Greening and Biodiversity Strategy and Public Realm Strategy, opportunities for greening, enhanced biodiversity and nature-based SUDS infrastructure must be identified and maximised in new public realm areas.*
- j) *Station designs (GA plans and photomontages) do not appear to demonstrate street furniture layouts. In line with the Public Realm Strategy and Age Friendly policy opportunities for public seating should be identified*
- k) *Bike parking and the transportation of bikes do not appear to be holistically considered as part of this application. To support a modal shift towards bike and rail these works*

should maximise bike parking opportunities around stations. Additional bike parking will impact the surrounding public realm so fully developed designs will require review by DCC”

Response to Issue Raised

The Applicant responds as follows to the comments of the City Architect:

- a) The Applicant refers to the response under Point 2 above in respect of this aspect.
- b) In respect of artworks, the Applicant can clarify that the proposed upgrades to the Howth Junction & Donaghmede Station provide station wide upgrades including new signage, lighting, finishes as well as artwork opportunities with the intent of using local artists. The rail works do not include specific provision for any other artworks as part of the Proposed Development.
- c) There are no proposed interventions to structures of heritage importance within the DCC administrative area as part of the DART+ Coastal North Project.
- d) The Applicant notes the significant upgrades proposed for Howth Junction & Donaghmede Station. These upgrades are proposed to develop the station to better serve as an interchange station into the future and in so doing, improve passenger experience generally. This design has considered universal design principles and the further development of the design through the detailed design phase will continue to adhere to these principles. The Applicant would also refer to the response provided under Section 2.3.1.6 herein, in this regard.
- e) The design has been developed to integrate as fully into the surrounding area as possible within the scope of the Project. This has included opening up the entrances to maximise visibility in and out of the station as well as adding an external canopy to protect passengers from the elements when leaving and to illuminate the entrance at night. Ticket machines have also been moved to external spaces to blur the boundaries between the inside and outside of the station, better connect to the local area, give activity to external areas and de-clutter the internal ticket hall space to improve accessibility. The ticket machines also include a canopy with lighting.

All external finishes are of a high quality such as green vitreous enamel cladding and brushed stainless steel.

All new stairs and lifts within the station are fully accessible designed to current legislation to create multiple step free routes to accommodate all passenger journeys.

Additional secure cycle parking has been added below the new station entrance stairs.

In respect of a response to points f) to k) above, the Railway Order application includes all of the detail necessary for the Proposed Development within the relevant application drawings,

EIAR, NIS and associated documentation. The Applicant would like to clarify that no changes to stations within the Dublin City Council administrative area, outside of the proposed upgrade to Howth Junction & Donaghmede Station described above are proposed as part of DART+ Coastal North. The Applicant further notes that no works to the public realm (outside the area of the station) are proposed. The green area immediately adjacent to the Donaghmede entrance to the station will be impacted during construction. As detailed in Chapter 15 Landscape and Visual of the EIAR, see Section 15.5.1.2.5 *“although not forming part of the designation, an adjoining area of amenity grass adjacent to the north of the station building will be used for temporary works. The works will impact on the amenity of the space at the closest portion (eastern end) but the majority of the space would remain unaffected. The sensitivity is high. The magnitude of change will be medium and the effect in the Construction Phase on this amenity designation will be Moderate, Negative, Temporary / Short-term.”*

The proposed upgrades to Howth Junction & Donaghmede Station are detailed in Chapter 4 Description of the Proposed Development, in Section 4.7.3.1 which includes a number of images showing the proposed changes. A number of photomontages have also been included in the Railway Order application, to illustrate the proposals at Howth Junction & Donaghmede Station. These are included in Volume 3B of the EIAR from Figure 15.3.1.1 to 15.3.4.2.

The reference to the *“statement regarding the Public Realm Strategy on page 79 of EIAR Vol 2 - Chapter 1 5 Landscape & Visual”* is assumed to refer to the following: *“Proposals for the treatment of the public realm within the streetscape effected by the Proposed Development will have regard to the existing character of the street or location, to emerging policies, objectives and proposals for the public realm and to opportunities for enhancement of the public realm and the streetscape. Proposals will have regard to historic details and features, to the quality of existing and proposed materials, to the reduction of visible elements, ease of legibility, and management and maintenance requirements”*. Where proposals for treatment of the public realm are proposed, these are included as necessary on the relevant Works Plans and the landscape drawings in the Railway Order application.

It is further noted that no changes to street furniture are proposed as part of DART+ Coastal North.

The Applicant refers to the response under Section 2.2.8 with respect to the provision of bike parking and the transportation of bikes. The Applicant further notes that the fleet changes proposed under the DART+ Programme has considered bike transportation in the design of the fleet.

3.1.1 Recommended conditions included in SB0049 - Dublin City Council

In its submission, DCC proposes a set of conditions which could be attached to any Railway Order granted for the Proposed Development, for consideration by An Bord Pleanála.

The Applicant welcomes the submission from Dublin City Council’s various departments. Below, noted in Table 4, is a summary of the proposed conditions raised by the various departments within DCC and the Applicant response. In the majority of cases, the Applicant

is satisfied that the proposed conditions are already catered for in the EIAR documentation and Construction Environmental Management Plan (CEMP) commitments in the draft Railway Order, and that no additional conditions are required in the event of a grant of the draft Railway Order.

Table 4 - Summary of Proposed Conditions (DCC)

Nr.	Recommended Condition	Applicant Response
Liaison between Irish Rail and Dublin City Council		
1	Irish Rail shall proactively liaise with Dublin City Council at all stages of the Project including from detailed design through construction to handover phases. Prior to the commencement of development, an agreed programme for liaison including a schedule of regular meetings shall be agreed in writing with Dublin City Council.	The Applicant has engaged extensively with DCC to date, through the options assessment, design development and non-statutory consultation process and will continue to do so.
Handover		
2	Prior to the commencement of any works, a formal Handover Procedure Agreement shall be agreed upon with Dublin City Council and put in place for all works to be undertaken on public lands. This procedure shall be carried out on any section of work as soon as it is completed. A global handover of all works at the end of the construction period shall not be permitted. As-built drawings of each section of the finished works shall be provided in A1-sized hard copy to an appropriate scale and also in an electronic format compatible with DCC's current version of Micro station. These as built drawings shall include details of any new services and alterations to existing services. Drawings shall also be provided showing exactly what areas are to be in DCC's charge.	With regard to the proposed condition the Applicant notes that the works within DCC public roads associated with the proposed DART+ Coastal North Project, are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
Existing Condition Record		
3	A photographic record of all areas in Dublin City Council's control to be affected by the scheme works shall be provided to Dublin City	With regard to the proposed condition the Applicant notes that the works within DCC public roads associated with the proposed DART+ Coastal

	Council (DCC) prior to the commencement of any work.	North Project, are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
4	Drawings distinguishing between antique granite footways and kerbs and new granite footways and kerbs shall be submitted as part of the detailed design development of the approved scheme	The works within DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station. Insofar as our investigations have shown, there are no antique granite footways and kerbs or new granite footways and kerbs to be affected by the Proposed Development.
Road Design and Construction		
5	Final details (including materials, finishes, sizes, gradients, levels and drainage) of all junctions, carriageways, islands, buildouts and footways as well as all signal/traffic light infrastructure shall be agreed with DCC prior to construction	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
6	New roads and alterations to existing roads shall comply with "Technical Acceptance of Road Structures on Motorways and Other National Roads DN-STR-03001 April 2019	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
7	Road Safety Audits shall be carried out for any new roads and each existing public road that is to be modified as part of the scheme works at appropriate stages throughout the design of each individual scheme	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.

8	<p>The alignment of any new or altered roads included as part of the Project shall be designed so as ensure that all longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways are in accordance with those specified in “Construction Standards for Road and Street Works in Dublin City Council” unless otherwise agreed with DCC.</p>	<p>We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.</p>
9	<p>The alignment of any new or altered roads included as part of the Project shall be designed so as ensure that all longitudinal gradients and crossfalls on carriageways, islands, buildouts and footways are in accordance with those specified in “Construction Standards for Road and Street Works in Dublin City Council” unless otherwise agreed with DCC.</p> <p>Bicycle parking proposed at the train stations, shall be secure, sheltered and well-lit with key/fob access. Bicycle parking shall be constructed and ready for use prior to commencement of the use and shall be designed in accordance with Appendix 5, Volume 2 of the Dublin City Development Plan 2022 - 2028 and the Cycle Design Manual, September 2023 published by the National Transport Authority.</p>	<p>We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.</p> <p>In respect of bicycle parking, the Applicant notes that bike storage will be provided as part of the upgrades to the Howth Junction & Donaghmede Station. The Applicant further confirms that all bicycle parking has been designed in accordance with the relevant technical standards.</p>
10	<p>Any alterations to kerbside spaces such as pay and display scheme/loading/line markings/signage poles shall be agreed upon with E&T Department at the detailed design stage.</p>	<p>We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.</p>
11	<p>All signage and road markings comply with the Traffic Signs Manual.</p>	<p>We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where</p>

		lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
12	Prior to the commencement of works, Irish Rail shall consult with the Roads Design and Construction Division of Dublin City Council regarding all works that impact bridges within Dublin City's jurisdiction. All works to bridges shall align with best practices as set out in TII Publications (Standards and Technical)	The Applicant notes that no works to bridges are required within the Dublin City Council administrative area, as the line is already electrified along this route.
Reinstatement and Maintenance		
13	All reinstatement work in areas to be taken in charge shall be carried out in accordance with <i>"Construction Standards for Road and Street Works in Dublin City Council"</i> unless otherwise agreed with DCC.	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
14	The extent and type of reinstatement required shall be agreed upon with DCC prior to the commencement of any work on site. This shall be shown on drawings and signed off on by both parties.	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
15	Detailed drawings shall be prepared and forwarded to Dublin City Council, setting out proposed construction details for any works to the public realm including proposed materials and construction details.	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
16	All proposed upgrade works that involve changes or additions to the existing public	We have engaged with the City Council and these matters have been set out in detail in the Railway

	realm, including alterations to the carriageway, footpaths, drainage systems, traffic infrastructure, public lighting etc. shall be completed in accordance with “ <i>Construction Standards for Road and Street Works in Dublin City Council</i> ” and in accordance with the ‘Guidelines for Managing Openings in Public Roads’, published by the Department of Transport. guidelines for managing openings in public roads apr. 2017.pdf (rmo.ie).	Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
17	Where applicable, samples of all new natural stone kerbs, flags and setts to be used in reinstatement and/or upgrade works shall be supplied to DCC for agreement prior to use.	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
18	Regarding bridge structures along the route, prior to the commencement of works Irish Rail and Dublin City Council shall agree in writing details regarding ownership and maintenance of bridges.	The Applicant notes that no works to bridges are required within the Dublin City Council administrative area, as the line is already electrified along this route.
Construction Period		
19	Prior to the commencement of works, Irish Rail shall engage with Dublin City Council to agree an overall Traffic Plan for all Project works including phasing of works, road closures and diversions etc. and which addresses the cumulative impact on traffic for the whole city. Irish Rail shall continually liaise with Dublin City Council during construction through an agreed schedule of regular meetings.	A construction traffic management plan (CTMP) has been prepared and is included as sub-Appendix G of the Construction Environmental Management Plan (CEMP), see Appendix A5-1 of the EIAR. This CTMP will be further developed by the Contractor in consultation with the relevant authorities, including Dublin City Council prior to construction.
20	All roadworks shall be carried out in accordance with the current edition of Dublin City Council’s Directive for the Control and Management of Roadworks in Dublin City unless otherwise agreed with DCC.	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads/public realm are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary

		basis to be reinstated to their original condition and returned to DCC on that basis.
21	In cases of reinstatement of areas where the roadway or footway is not being reconstructed in full (e.g. trench for utility alongside street), Irish Rail or their Contractor shall pay DCC long-term impact charges as set out in the 'Guidelines for Managing Openings in Public Roads', published by the Department of Transport. guidelines for managing openings in public roads apr. 2017.pdf (rmo.ie) .	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads/public realm are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis.
22	All antique setts if removed as part of the works shall be cleaned, stored on pallets by the contractor and reinstated in the carriageway to DCC's specification if required by DCC unless otherwise agreed with Dublin City Council.	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant notes that works within the DCC public roads/public realm are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Insofar as our investigations have shown, no antique setts are to be removed as part of the Proposed Development.
23	All existing and antique natural stone kerbs and flags, if removed without damage as part of the works, shall be cleaned, stored on pallets by the contractor and reinstated in the footway to DCC's specification.	As above. Insofar as our investigations have shown no existing and antique natural stone kerbs and flags are to be removed as part of the Proposed Development.
24	Specific areas and infrastructure to be taken in charge shall be agreed in writing with Dublin City Council	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant has engaged extensively with DCC to date, through the options assessment, design development and non-statutory consultation process and will continue to do so.
25	Where relevant, works shall comply with Dublin City Council's procedure for "Ground Anchors Installations" shall be adhered to as contained at https://www.dublincity.ie/residential/transportation/apply-licence-or-permit/ground-anchor-installation-Environment	The Applicant notes that no ground anchors are proposed within the DCC administrative area as part of the Proposed Development.

Environment and Drainage

26	<p>Surface water management should be given appropriate consideration at the early design stage. All surface water designs shall be submitted for written approval well in advance of the commencement of construction work. All drainage works shall comply with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0 (Dublin City Council > Surface Water Maintenance)</p>	<p>This has been fully considered and full details of our proposed surface water management have been provided in our Railway Order application. Chapter 5 of the EIAR describes the Proposed Development, including our proposals for surface water management which are based on SUDS principles and all details are shown on the drawings which accompanied the Railway Order application. Chapter 10 Water in the EIAR further describes the aspects of the development relevant to hydrology, water quality and flooding and includes a comprehensive assessment, concluding that no significant effects will result from the Proposed Development. A detailed Construction Environmental Management Plan has also been prepared (see Appendix A5-1 of the EIAR and the Surface Water Management Plan which is contained therein contains a suite of measures to ensure that surface water is appropriately managed during the construction phase of the Project.</p>
27	<p>Surface water shall be managed so that discharge to public sewers is avoided whenever possible in line with Dublin City Council's Sustainable Drainage Design & Evaluation Guide 2021. In order to achieve this the following hierarchy shall be adopted:</p> <ol style="list-style-type: none"> 1) Reuse of water on site 2) Infiltrate into the ground. 3) Discharge to a natural watercourse. 4) Discharge to a surface water network. 5) Discharge to a combined network. 	<p>This has been fully considered and full details of our proposed surface water management have been provided in our Railway Order application. Chapter 5 of the EIAR describes the Proposed Development, including our proposals for surface water management which are based on SUDS principles and all details are shown on the drawings which accompanied the Railway Order application.</p>
28	<p>Any discharge of surface water to public sewers shall be limited to 21/s/ha. DCC requires Sustainable Drainage Systems (SuDS) to be implemented in the management of surface water. The design of SuDS should aim to deliver the full range of benefits</p>	<p>SuDS principles have been fully considered throughout the design and full details of our proposed surface water management have been provided in our Railway Order application. Chapter 5 of the EIAR describes the Proposed Development, including our proposals for surface</p>

	including, volume control, improved water quality, enhanced biodiversity and amenity. The management of surface water should start as close as possible to the source of the run-off and should include a series of SuDS components linked together into a management train, in considering SuDS components, preference shall be given to soft engineering solutions which mimic the natural water cycle. Discharge managed via a pipe and an attenuation tank system shall be the last option considered.	water management and all details are shown on the drawings which accompanied the Railway Order application.
29	Given the nature of the Proposed Development, which includes large sections of tracks located in deep cutting below surrounding ground level, the risk of flooding during both the construction and operational phase will need to be carefully considered. The risk of flooding from all sources shall be assessed in accordance with the OPW Planning System and Flood Risk Management Guidelines, and the Dublin City Development Plan - Strategic Flood Risk Assessment (SFRA). The proposed scheme should not increase and if reasonably possible reduce the risk of flooding to any other development and the flood risks to the Project itself should be addressed through appropriate design. Where residual risks exist, measures for their management or mitigation shall be implemented.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. Flooding has been fully considered and a Project specific Flood Risk Assessment has been prepared in accordance with all relevant best practice guidance. The Flood Risk Assessment was submitted with the Railway Order application. Chapter 10 Water in the EIAR further describes the aspects of the development relevant to flooding and includes a comprehensive assessment, concluding that no significant effects will result from the Proposed Development. A detailed Construction Environmental Management Plan has also been prepared (see Appendix A5-1 of the EIAR and the Surface Water Management Plan which is contained therein contains a suite of measures to ensure that surface water is appropriately managed during the construction phase of the Project.
30	Any works that may impact the existing DCC drainage infrastructure shall be agreed upon with DCC Drainage Division who must be consulted prior to such works commencing.	We have engaged with the City Council and these matters have been set out in detail in the Railway Order Application and the associated drawings. The Applicant has engaged extensively with DCC to date, through the options assessment, design development and non-statutory consultation process and will continue to do so.
31	A clear minimum distance of three metres (or greater for deep sewers) shall be maintained between public sewers and all structures on site. No additional loading shall be placed on a sewer and any damage to a sewer shall be rectified at NTA's expense. A proposed surface	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. Drainage design associated with these works has been fully considered and full details of our proposals in this regard have been provided in our

	water layout shall be submitted to the Drainage Division indicating proposed clearance/diversion, following site investigations, for written agreement with the DCC Drainage Division prior to the commencement of the Project Any sewers which are impacted by the Project (i.e. sewers whose later maintenance would require consultation with Irish Rail) are to be CCTV surveyed before construction commences and upgraded if this is deemed necessary by Drainage Division. Future maintenance responsibility for all new and altered surface water drainage elements of the Project and all existing drainage in proximity to the tracks is to be agreed with the Drainage Division.	Railway Order application and the accompanying drawings.
Public Lighting		
32	Careful consideration needs to be given to the Lighting around station areas to ensure they are adequately lit. Areas to be taken in charge around stations shall be agreed upon, i.e. DCC areas and Irish Rail areas.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. Any public lighting associated with these works has been fully considered and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
33	On many of the bridges, a new lighting scheme will be required to replace the existing old lighting infrastructure. The new lighting infrastructure will need to include lighting columns/LED lights, PL ducts & chambers, PL cables, new electrical supplies etc.	No permanent works to bridges are proposed within the DCC administrative area.
34	In general, if bridges are closed during construction, then temporary lighting may not be required. However, if bridges remain open to the public, then lighting, whether it be temporary or existing, will need to be provided or maintained.	No permanent works to bridges are proposed within the DCC administrative area.
35	Briefings are to be provided on the general layouts when they are available in order to fully understand and assess public lighting requirements. Ongoing consultation is required at all stages from design, to construction, to	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. Any public lighting associated with these works has been fully considered and full details of our

	testing, commissioning and handover/taking charge. A formal documented approvals process shall be put in place with sign-off at each stage.	proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
36	New and/or altered public lighting schemes shall comply with and be designed to IS EN13021. They shall also comply with DCCs General Specification for Public Lighting Light Level Classes will be dependent upon Daily Traffic Flows and levels of usage (both vehicular and pedestrian) and need to be formally agreed upon and signed off for each area of the Project. This may require re-assessment and possible reclassification of Light Level Classes to meet IS EN13021. Particular attention needs to be paid to light levels at entrances to stations and the areas around them where higher levels may be required (and different standards apply). Lighting needs to be treated holistically. If half a junction is being reconstructed the whole junction needs to be looked at and assessed holistically from a lighting standpoint to comply with standards. All public lighting works shall be carried out by a competent public lighting contractor or operator (such as DCC Public Lighting Services).	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Any public lighting associated with these works has been fully considered, designed in accordance with all relevant technical standards and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
37	In areas where construction activities are taking place and there will continue to be some public access, these areas must remain lighted at all times. Maintaining lighting can be achieved by maintaining the existing public lighting infrastructure during construction or removing the existing public lighting infrastructure and providing agreed temporary lighting or providing the new public lighting infrastructure in advance of decommissioning the existing infrastructure.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The requirements for lighting during the construction phase have been considered and are included in the Railway Order application. A detailed Construction Environmental Management Plan has been prepared (see Appendix A5-1) which includes a suite of measures (including in respect of lighting) which will be implemented during the construction phase. This CEMP will be further developed by the Contractor in consultation with the relevant authorities prior to the commencement of construction.
38	A Condition Assessment of lighting infrastructure will be required in advance. Replacement of existing Lighting Infrastructure with new infrastructure is likely. Some Lighting	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public

	Infrastructure will be at the end of life and the upgrading of luminaires may require the upgrade of the entire PL asset, including the column, cabling, and ducting for electrical and lighting compliance. Upgrade of luminaires to high-efficiency LED luminaires is a minimum requirement for each area. LEDs must comply with DCC General Specification.	roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Any public lighting associated with these works has been fully considered, designed in accordance with all relevant technical standards and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
39	Lighting circuits and electrical supply locations shall be established at the design stage. It shall be established whether any third-party infrastructure, e.g. Traffic Lights, are supplied from the public lighting infrastructure and, if so, their relocation planned accordingly, if applicable.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Any public lighting associated with these works has been fully considered, designed in accordance with all relevant technical standards and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
40	There is a limitation on where lights can be relocated. Careful consideration is needed in this regard. Street clutter shall be minimised to avoid a plethora of supply pillars and other street furniture.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Any public lighting associated with these works has been fully considered and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
41	Lighting Works may require alterations to other Utility Services. Permits may be required to work on lights, e.g. close to lights on ESB Network Infrastructure or Luas Tram Network Infrastructure.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to

		DCC on that basis. Any public lighting and associated works have been fully considered and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
42	Careful consideration needs to be given to all proposed tree locations with respect to light locations to reduce potential blocking that could result in carriageways and footways being in darkness. Lighting Designers also need to carefully consider existing tree locations in their designs.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Aspects of lighting design including consideration of biodiversity aspects and trees have been fully considered and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
43	GPPR surveys may be needed in advance of construction in certain areas. All underground services shall be located, and possible underground congestion identified. Any cellars under footpaths/roads shall be identified. This shall facilitate detailed design of new lighting infrastructure and be used to identify possible locations for lighting columns and duct routes etc.	The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Any public lighting and associated works have been fully considered, designed in accordance with all relevant technical standards and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
44	DCC Public Lighting (PL) is the only ESB-authorised body that is responsible for managing streetlights mounted on ESB Networks Infrastructure in Dublin City Council. Those involved in Projects such as DART Expansion cannot alter, remove or relocate lighting infrastructure mounted on ESB Infrastructure without DCC PL and ESNB approval.	This requirement is noted by the Applicant. The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. The Applicant notes that works within the DCC public roads are limited to some minor works at Howth Junction & Donaghmede Station, where lands are being acquired on a temporary basis to be reinstated to their original condition and returned to DCC on that basis. Any public lighting and associated works

		have been fully considered, designed in accordance with all relevant technical standards and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.
Noise, Vibration and Air Quality Control – Demolition and Construction Phase		
45	The works shall be carried out having regard to a Construction Management Plan submitted with the application. The Plan must be written having regard to the Dublin City Council Air Quality Monitoring and Noise Control Unit's Good Practice Guide for Construction and Demolition (<u>Dublin City Council > Residential > Environment > Air Quality Monitoring and Noise Control Unit</u>)	A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR which accompanies the Railway Order application. The CEMP has been prepared in accordance with best practice and includes a suite of measures in respect of noise, vibration and air quality, which will ensure that environmental impacts are minimised during the construction phase. The CEMP will be further developed by the Contractor prior to construction, in consultation with the relevant authorities. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.
46	The Plan shall be approved by the Planning Department before work commences. The Plan shall include remedial measures committed to in the EIS, identified owing to the results of the baseline monitoring survey.	A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR which accompanies the Railway Order application. The CEMP has been prepared in accordance with best practice and includes a suite of measures in respect of noise, vibration and air quality, which will ensure that environmental impacts are minimised during the construction phase. The CEMP will be further developed by the Contractor prior to construction, in consultation with the relevant authorities. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.
47	The hours of operation for the construction phase for all construction sites including depots shall be restricted to 7.00am to 6pm, Monday to Friday, and 8.00am to 2.00pm on Saturdays. Permission to work outside of these hours shall be subject to the approval of Dublin City Council.	The Applicant would have very serious concerns around a condition of this type, given the nature of the works and the need to minimise disruption to the operational railway. While general construction works away from the railway line (e.g. substation construction) will be undertaken during normal construction hours (see Chapter 5 Construction

		<p>Strategy of the EIAR, Section 5.2.2), it is noted that the construction of the DART+ Coastal North Project requires track possessions (i.e. temporary track closures) to enable construction works to be completed. As detailed in Section 5.2.2 of the EIAR, <i>“In general, night-time possessions will be utilised, but it is anticipated that a number of daytime and weekend possessions will also be required, to accommodate the construction works. These possessions will be planned with other railway works and peak railway user demand periods in mind”</i>. The track possession types and durations are set out in Table 5-3 of the EIAR.</p> <p>Given that some works will often need to be undertaken when the railway is closed to train services, a number of the construction compounds will often need to be active at night and at weekends, to allow Contractors to marshal construction plant and materials, involving both road and rail vehicles. As detailed in Section 5.2.2 of the EIAR: <i>“Any proposed track possession periods will be finalised when detailed design and detailed construction planning is undertaken. For the purposes of the EIAR a reasonable worse case has been assumed here and for the assessments undertaken in Chapters 6 to 27 in Volume 2 of this EIAR”</i>.</p> <p>It is noted that neither DART+ West nor DART+ Southwest contained such a condition. or the reasons noted above, the Applicant respectfully requests that this condition not be attached to any grant of permission.</p>
Operational Noise		
48	<p>Additional noise monitoring shall be completed within Zone A to ensure a record of the baseline in this Zone, pre-Proposed Development, is established and the results compared with the noise model developed for the EIAR and also the Round 4 strategic noise maps. Locations shall be agreed with Dublin City Council.</p>	<p>As described in section 14.4 of the EIAR, baseline noise monitoring was conducted near sensitive properties that have the potential to be impacted by noise. Since the Proposed Development is likely to result in a negligible noise impact in Zone A, the strategic noise maps and operational noise model of the ‘Do Nothing’ Scenario have been considered sufficient to define the baseline noise climate for the existing receiving environment in this area.</p>

		As described in section 14.5.2.3 of the EIAR, the noise change used to determine the impact of operational railway noise is calculated for the 'Do Something' scenario compared to the 'Do Minimum' scenario (future receiving environment). Predictions of the 'Do Nothing' scenario (existing receiving environment) are not used to determine the noise impact and the Round 4 strategic noise maps provide a record of the baseline in this Zone pre-Proposed Development. Therefore, additional noise monitoring within Zone A would not affect the results of the operational noise assessment for the EIAR and are not proposed to record the baseline pre-proposed developed.
49	A review of measures that could help achieve a reduction in environmental noise, from present and future rail operations, shall be conducted in collaboration with Dublin City Council for Zone A, and particularly PIA9, to consider what positive contribution could be made to reducing environmental noise in these areas and in-line with Ireland's commitment and obligations under the Environmental Noise Directive (END).	The scheme has been designed to reduce in as much as possible the noise impact, with in particular the new DART fleet being electrical multiple units. A detailed assessment of operational noise impacts has been undertaken and is presented in Chapter 14 Noise and Vibration of the EIAR. This concludes that no significant noise impacts have been identified for the operation of the railway. The Applicant will continue to implement noise reduction measures with regard to fleet and ongoing railway operations as much as possible.
Conservation/Heritage Conditions		
50	A full-time conservation professional shall be employed to advise on the proposals at all stages of the Project. The conservation professional shall advise the Conservation Section on architectural heritage and conservation matters that may have further impacts on the Project throughout the construction phases.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed architectural heritage assessment has been carried out and is included in Chapter 21 Architectural Heritage of the EIAR. This concludes that there are no direct or indirect effects from the Proposed Development on architectural heritage within the DCC administrative area.
51	Iarnród Éireann shall engage with the Planning & Property Development Department/Conservation Section in relation to potential impacts on architectural heritage arising from the Project implementation and	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed architectural

	operation, ensuring such impacts are monitored by the design team so as to inform the design and mitigate against any adverse impacts on architectural heritage during rather than after the design process.	heritage assessment has been carried out and is included in Chapter 21 Architectural Heritage of the EIAR. This concludes that there are no direct or indirect effects from the Proposed Development on architectural heritage within the DCC administrative area.
52	Iarnród Éireann shall engage with the Planning & Property Development Department/Conservation Section in relation to potential impacts on architectural heritage arising from the Project implementation and operation, ensuring such impacts are monitored by the design team so as to inform the design and mitigate against any adverse impacts on architectural heritage during rather than after the design process.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed architectural heritage assessment has been carried out and is included in Chapter 21 Architectural Heritage of the EIAR. This concludes that there are no direct or indirect effects from the Proposed Development on architectural heritage within the DCC administrative area.
53	If, through the course of construction work, hitherto unknown and concealed architectural heritage fabric is found, the conservation professional shall contact the Conservation Section to advise them of the discovery as the presence of historic fabric may inform an alternative strategy for a design proposal that would enhance the setting of a Protected Structure, other historic buildings and features, or Conservation Area.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed architectural heritage assessment has been carried out and is included in Chapter 21 Architectural Heritage of the EIAR. This concludes that there are no direct or indirect effects from the Proposed Development on architectural heritage within the DCC administrative area. A comprehensive inventory of architectural heritage buildings, and structures has been compiled and was provided in Chapter 21 (Architectural Heritage), Section 21.5 in Volume 2 of the EIAR. However, if any such material is identified during the works, the Applicant will engage with DCC in this regard.
54	All works shall be carried out in accordance with best conservation practice, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the Advice Series issued by the Department of the Housing, Local Government and Heritage. All repair works shall retain the maximum amount of surviving historic fabric in situ. Items to be removed for repair off-site shall be recorded	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed architectural heritage assessment has been carried out and is included in Chapter 21 Architectural Heritage of the EIAR. This concludes that there are no direct or indirect effects from the Proposed Development on architectural heritage within the DCC administrative area. A suite of mitigation measures

	prior to removal, catalogued and numbered to allow for authentic re-instatement.	has been proposed for the overall scheme (see Chapter 21 and Appendix 21-1 of the EIAR). These mitigation measures have had regard to the Department of Arts, Heritage and the Gaeltacht (DAHLG) (2011) Architectural Heritage Protection Guidelines for Planning Authorities, as referenced therein.
55	All existing original architectural heritage features in the vicinity of the works shall be protected during the course of all phases of construction works.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed architectural heritage assessment has been carried out and is included in Chapter 21 Architectural Heritage of the EIAR. This concludes that there are no direct or indirect effects from the Proposed Development on architectural heritage within the DCC administrative area.
56	All repair of historic fabric shall be scheduled and carried out by appropriately experienced conservators of historic fabric.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed architectural heritage assessment has been carried out and is included in Chapter 21 Architectural Heritage of the EIAR. This concludes that there are no direct or indirect effects from the Proposed Development on architectural heritage within the DCC administrative area.
Archaeology Conditions		
57	A Project Archaeologist shall be appointed by Irish Rail to assist the design team in the detailed design and construction and to ensure the successful delivery of the EIAR recommendations.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed archaeology and cultural heritage assessment has been carried out and is included in Chapter 20 Archaeology and Cultural Heritage of the EIAR. This identified only one area of archaeological potential within Zone A (DCC administrative area), which is AAP1 Fairview Park. The proposed works were determined to be not significant and imperceptible as works are proposed in made ground within the depot and

		<p>railway line. The assessment concluded that no further mitigation was required.</p> <p>For the overall DART+ Coastal North Project, a suite of measures are set out in Chapter 20 which includes the appointment of a Project Archaeologist.</p>
58	<p>If any archaeological material is discovered within the Dublin City Council area, the City Archaeologist, the National Monuments Service, Dept. of Housing, Heritage and Local Government and the National Museum of Ireland shall be notified immediately.</p>	<p>The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed archaeology and cultural heritage assessment has been carried out and is included in Chapter 20 Archaeology and Cultural Heritage of the EIAR. This identified only one area of archaeological potential within Zone A (DCC administrative area), which is AAP1 Fairview Park. The proposed works were determined to be not significant and imperceptible as works are proposed in made ground within the depot and railway line. The assessment concluded that no further mitigation was required.</p> <p>For the overall DART+ Coastal North Project, a suite of measures are set out in Chapter 20 which includes the ongoing monitoring of the works in accordance with DHHLG and NMI requirements.</p> <p>Should An Bord Pleanála grant the Railway Order, the Applicant would have no objection to this being a condition attached to the Railway Order.</p>
59	<p>If any archaeological material is discovered within the Dublin City Council area, the City Archaeologist, the National Monuments Service, Dept. of Housing, Heritage and Local Government and the National Museum of Ireland shall be notified immediately.</p>	<p>The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed archaeology and cultural heritage assessment has been carried out and is included in Chapter 20 Archaeology and Cultural Heritage of the EIAR. This identified only one area of archaeological potential within Zone A (DCC administrative area), which is AAP1 Fairview Park. The proposed works were determined to be not significant and imperceptible as works are proposed in made ground within the depot and railway line. The assessment concluded that no further mitigation was required.</p>

		<p>For the overall DART+ Coastal North Project, a suite of measures are set out in Chapter 20 which includes the ongoing monitoring of the works in accordance with DHHLG and NMI requirements.</p> <p>Should An Bord Pleanála grant the Railway Order, the Applicant would have no objection to this being a condition attached to the Railway Order.</p>
60	<p>All archaeological mitigation for the scheme shall comply with national policy and best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.</p>	<p>The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed archaeology and cultural heritage assessment has been carried out and is included in Chapter 20 Archaeology and Cultural Heritage of the EIAR. This identified only one area of archaeological potential within Zone A (DCC administrative area), which is AAP1 Fairview Park. The proposed works were determined to be not significant and imperceptible as works are proposed in made ground within the depot and railway line. The assessment concluded that no further mitigation was required.</p> <p>For the overall DART+ Coastal North Project, a suite of measures are set out in Chapter 20. Mitigation measures shall be undertaken as directed by the Minister of the DHLGH in compliance with the code of practice, national policy guidelines and statutory provisions for the protection of archaeology and cultural heritage.</p> <p>Should An Bord Pleanála grant the Railway Order, the Applicant would have no objection to this being a condition attached to the Railway Order.</p>
61	<p>Should archaeological excavation be required in the Dublin City Council area, the primary archaeological paper and digital archive shall be prepared and deposited with the Dublin City Archaeological Archives in a timeframe and format agreed with the planning authority.</p>	<p>The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed archaeology and cultural heritage assessment has been carried out and is included in Chapter 20 Archaeology and Cultural Heritage of the EIAR. This identified only one area of archaeological potential within Zone A (DCC administrative area), which is AAP1 Fairview Park. The proposed works were determined to be</p>

		<p>not significant and imperceptible as works are proposed in made ground within the depot and railway line. The assessment concluded that no further mitigation was required.</p> <p>For the overall DART+ Coastal North Project, a suite of measures are set out in Chapter 20. Mitigation measures shall be undertaken as directed by the Minister of the DHLGH in compliance with the code of practice, national policy guidelines and statutory provisions for the protection of archaeology and cultural heritage.</p> <p>Should An Bord Pleanála grant the Railway Order, the Applicant would have no objection to this being a condition attached to the Railway Order.</p>
62	<p>A strategy for the dissemination/publication of any archaeological reports and information generated as a result of the Dart + Coastal North project shall be developed and implemented by the Project archaeologist with agreement of the planning authority Archaeologist.</p>	<p>The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. A detailed archaeology and cultural heritage assessment has been carried out and is included in Chapter 20 Archaeology and Cultural Heritage of the EIAR. This identified only one area of archaeological potential within Zone A (DCC administrative area), which is AAP1 Fairview Park. The proposed works were determined to be not significant and imperceptible as works are proposed in made ground within the depot and railway line. The assessment concluded that no further mitigation was required.</p> <p>For the overall DART+ Coastal North Project, a suite of measures are set out in Chapter 20. Mitigation measures shall be undertaken as directed by the Minister of the DHLGH in compliance with the code of practice, national policy guidelines and statutory provisions for the protection of archaeology and cultural heritage.</p> <p>Should An Bord Pleanála grant the Railway Order, the Applicant would have no objection to this being a condition attached to the Railway Order.</p>
Architecture Conditions		

63	The siting of all utility cabinets and other above-ground utility infrastructure shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. No such works as envisaged by this condition are proposed by the Applicant within the DCC administrative area.
64	A full palette of street furniture and their proposed locations shall be submitted to and agreed in writing with the planning authority prior to commencement of development.	The Applicant has engaged throughout with Dublin City Council. The works proposed within the DCC administrative area are limited, including works at Fairview Depot and at Howth Junction & Donaghmede Station. No such works as envisaged by this condition are proposed by the Applicant within the DCC administrative area.
65	The selection and location of artworks along the route as part of the Percent for Art strategy shall be reviewed and agreed upon with the local authority Arts Office and submitted to, and agreed in writing with, the planning authority prior to commencement of development.	The railway works have not included any provision for artworks as part of this Project.
City Valuers		
66	<p>Where DCC land is impacted by the Project, the following should apply:</p> <p>DCC should be compensated for its lands utilised for the Project, both permanent and temporary take (including compounds), and including tenanted and leased properties whether title is/ is not taken, in accordance with the Acquisition of Land (Assessment of Compensation) Act 1919, as amended.</p> <p>If title to DCC land is being transferred to IE or another, the Council, in addition to compensation under (i) above, should retain the air-rights for the development process.</p> <p>Appropriate accommodation works should be provided at DCC properties affected by the Project.</p> <p>Where alterations are proposed to the road network and/ or alternative access and parking arrangements are sought, IE should clearly identify which of the lands affected are public or private.</p>	The Applicant does not consider it appropriate to discuss issues related to compensation, air rights or accommodation works, as detailed herein, as part of a planning condition.

3.2 SB0058 – Fingal County Council (FCC)

Fingal County Council has made a submission welcoming the decision to progress with the DART+ Coastal North Project, noting its support for the significant benefits it will bring to Fingal and to the wider Dublin region. Fingal County Council welcomes the amendments to the scheme which have been made following PC2 consultation. While there are issues which the local authority has highlighted within the submission which they believe would benefit from further consideration and appraisal, FCC is supportive of the planned investment in rail infrastructure as set out in DART+ Coastal North and states that the Council looks forward to further engagement with Iarnród Éireann.

The submission from FCC includes comments from various internal departments/divisions, including the FCC Planning and Strategic Infrastructure Team, Architectural Heritage and Conservation Sections, the Environmental Department, Parks Department, and the Water Section.

1. Summary of Issue Raised

The submission notes that *“Fingal County Council is supportive of this strategic infrastructure and the authority welcomes the opportunity to engage with Iarnród Éireann to ensure an optimal design solution for communities located along the rail corridors in Fingal, and to the delivery of high-quality transport options for Fingal and the wider Dublin area and for the Eastern region.”*

Response to Issue Raised

The Applicant welcomes the views of Fingal County Council in this regard and has engaged from a very early stage with the authority to ensure that its views on all aspects of the Proposed Development were considered.

2. Summary of Issue Raised

Fingal County Council notes that *“DART+ Coastal North fulfils key strategic objectives of the FDP 2023-2029 for sustainable growth, connecting existing and new communities and employment areas along the route with Dublin City Centre and the wider region as well as providing transport mobility and 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 transport related carbon emissions.”*

Response to Issue Raised

The Applicant welcomes the views of Fingal County Council in this regard.

3. Summary of Issue Raised

A key area of concern for Fingal County Council relates to the *“extensive construction compound proposed within the high amenity lands of ‘Racecourse Park’”. These lands adjoin the Mayne River which flows into the adjoining Baldoyle Estuary, a designated European site. The FDP 2023-2029 includes protection requirements in relation to the Maye River notably,*

Objective IUO26 which seeks to establish riparian corridors free from new development along all significant watercourses and streams in the county within development boundaries and to ensure a minimum 10m wide riparian buffer strip measured from the top of the bank either side of all watercourses.”

The Fingal County Council submission also notes that “*consideration should also be extended to interfaces with the permitted greenway, proposed haul route, as well as reinstatement proposals. Of particular concern is the extent and configuration of the planned construction compound as outlined in Works Layout Plans 7& 8. Currently, this feature is sited in an area planned for the development of a significant Active Regional Hub, a key component of the Baldoyle Racecourse Regional Park currently under development. Consideration should be given in this regard to modifying/reducing the extent and layout of the construction compound to avoid extended delays in delivering the anticipated sports facilities.*”

Response to Issue Raised

The first thing to note in this regard, is that the construction compound is temporary and therefore, in respect of the high amenity lands of ‘Racecourse Park’, it will be a temporary/short-term impact and the area will be fully reinstated post completion of the construction works.

With regard to the potential for effects on sensitive receptors including the Mayne River and Baldoyle Estuary, the Applicant notes that Chapter 8 of the EIAR, Biodiversity, Section 8.9.1.2.1 makes reference to the Surface Water Management Plan which will form part of the construction process. Bullet point 4 within this section of the EIAR refers to the provision of settlement tanks, silt traps/bags and bunds to be used where required to remove silt from surface water runoff. Sizing of the tanks will be based on best available guidelines, including CIRIA (2006). Any construction work within a 10m buffer zone must be provided with these measures to minimise sediment discharge to a watercourse.

The mitigation measures to protect surface water during the Construction Phase are also outlined in Chapter 10 of the EIAR, Water, and also in Appendix A5.1 - CEMP in Volume 4 of the EIAR.

Section 1.3.2 of the CEMP for example, includes the following:

“The Construction Compound at this location also encroaches on the Mayne River floodplain. At this location, it will be necessary to apply the following measures to mitigate the potential impacts:

- *Obtain all necessary consents from the relevant authorities (IFI, OPW, etc.);*
- *Bank stabilisation and erosion protection should be in place for the entire construction period; and*
- *Reinstate banks that are affected by the works to original or better stable state.”*

The Applicant recognises the challenges presented by the limited access and constrained compound area at Clongriffin Station. Careful consideration has been applied to ensure that the construction methodology and compound layout are efficient, minimise disruption, and

respect the surrounding developments and parklands, including the Baldoyle Racecourse Regional Park to the east and Shoreline Developments to the south. please refer to Chapter 5 Construction Strategy of the EIAR and in particular Section 5.3.2. These constraints necessitate careful planning for both access and compound placement. The compound area has been carefully sized and reduced where possible to limit its effect on the proposed playing fields within the Baldoyle Racecourse Regional Park. The construction compound's impact has been reduced to only 2 of the 7 proposed playing fields, ensuring the remaining areas are unaffected.

The construction compound (CC-10600) is strategically positioned to directly support works on the permanent way, retaining walls, embankment, culvert extension and new bridge, in the vicinity of Clongriffin Station. By locating the compound adjacent to construction works, along the entire eastern railway boundary, minimises the impact on the operational railway and minimises the distance required for transporting materials and equipment, thereby improving efficiency.

This compound serves as a critical hub for line-wide works, including the installation of OHLE (overhead line equipment) and associated cabling systems. Its location allows it to function effectively as part of the larger construction network.

The site selection accounted for nearby sensitive receptors, including in respect of air quality and noise-sensitive areas. Mitigation measures are planned to minimise the impact on these receptors. The location is adjacent to the River Mayne, which was considered during design development to mitigate any potential environmental impacts on water resources during the construction of the new bridge.

The compound's location ensures good access by road and rail, facilitating the movement of heavy construction vehicles, materials, and personnel. This accessibility was a key consideration in its selection. The R123 (Moyne Road) to the north, connecting to the M50/M1 via the R139 and Junction 3, is the primary strategic access route for the compound. Access to the site will be shared between contractors for the Proposed Development and the adjacent housing development, utilising the newly constructed road leading to the station.

The Applicant has engaged with, and will continue to engage with, Fingal County Council.

4. Summary of Issue Raised

In relation to Built Heritage, Fingal County Council has submitted that *"A careful balance is required between the need to preserve and enhance the built heritage features on or adjoining the proposed scheme and the provision of this strategic infrastructure. The Project should be designed to minimise the impact on the architectural, archaeological, and designed landscape heritage, having regard to the relevant protection and enhancement provisions set out in Chapter 10, Heritage, Culture and Arts of the FDP 2023-2029. In this regard, key areas of consideration relate to the following proposed works on, or adjacent to existing protected structures:*

- a) *Balbriggan Viaduct: Historic images of the viaduct show that originally, vertical breaks were formed by solid metal capital/panels to the top of each pilaster fronting the arches/piers of the viaduct. It would be desirable that these elements of the original design, (or a modern interpretation which satisfactorily addresses Health and Safety requirements), be reinstated to the outer face of the pedestrian railing and form a consideration of the proposed scheme.*
- b) *Pedestrian overbridges Donabate, Rush and Lusk: Whilst it is acknowledged that the inclusion of solid panels to the parapets of existing pedestrian overbridges are proposed in the context of safety requirements, further consideration should be given to a more appropriate aesthetic where the panels are as visually permeable as possible to mitigate the overall impact on existing bridge parapets.*
- c) *Rush and Lusk: Further consideration should be given to a reduction in the overall scale, massing, and height of the proposed substation building, with an attempt to break up the proposed structure into smaller volumes given its proximity to the historic Rush and Lusk Train Station complex. Use of appropriate materials/finishes to ensure visual harmony and which incorporate low maintenance finishes should be considered.*
- d) *Malahide: The location of a new signalling and telecoms equipment building should be re-examined and relocated as close as possible to the northern end of the platform, away from the original historic Malahide Train Station building. Materials/finishes should ensure visual harmony and be discrete as possible, e.g. grey brick finish rather than yellow.*
- e) *Clongriffin: a new rail bridge is proposed to the east of the protected structure (RPS No. 919 Rail Bridge, Clongriffin) (Iarnród Éireann Ref. UBB19) to carry the East Loop Line. Further consideration should be given to ensuring an enhanced fencing design to the protected bridge, in place of the existing palisade fencing proposed for retention.*

The imposition of appropriate conditions, as necessary to address the foregoing would be welcomed by the Planning Authority."

Response to Issue Raised

The Applicant has engaged extensively with Fingal County Council throughout the site selection and design development of DART+ Coastal North, including in particular, a number of meetings and numerous correspondences in respect of Architectural Heritage issues. This includes the following relevant correspondences:

- 2023-03-07: An initial meeting was held with representatives of Fingal County Council Heritage & Conservation Department. The meeting provided an overview of the interventions proposed with the potential to affect structures within the Fingal Co Council jurisdiction. The meeting focussed on the proposed works to the Malahide Viaduct, Rogerstown Viaduct, Balbriggan Viaduct, as well as those parapet modifications proposed to 6 overbridges required by the Project, 5 footbridges, and 2 Masonry Arch bridges.

The meeting allowed Fingal Co Council to raise a number of queries and concerns relating to the proposals presented, some of which were clarified at the time and others which were taken away for further consideration/assessment by the design team.

- 2023-05-23: Request made by the Applicant for Fingal Co Council input to photomontage locations.
- 2023-07-27: An email was issued to Fingal Heritage and Conservation Officers, including minutes from previous meeting of 2023-03-07, outlining the modifications proposed to close out the concerns raised by Fingal Co Council.
 - A series of email correspondences closed out many of the initial concerns raised by Fingal County Council.
 - A follow up meeting was proposed for 2023-09-05 to close out any remaining concerns not addressed in email correspondences.
- 2023-09-05: A meeting was held via MS Teams to attempt to close out remaining Fingal Co Council concerns with the DART+ Coastal North proposals. Fingal County Councils preferences in relation to the necessary interventions were made clear.
- Further to the meeting of 2023-09-05 further assessments and revisions were carried out by the design team leading to further email correspondences between 2023-11-02 and 2023-12-05. In an email of 2023-12-05, Fingal County Council noted that they considered all issues discussed previously to be closed out, with the exception of the visual impacts on the existing River Mayne Bridge UBB19. In this respect, Fingal accepted in principle, the rationale behind the DART+ Coastal North proposals and acknowledged that the structure is not being physically impacted as a mitigating factor.

In respect of each of the key points a) to e) above, the Applicant responds as follows:

- a) Balbriggan Viaduct: As detailed above, extensive consultation was undertaken with Fingal County Council during the design development. This led to changes to the design to ensure that we met with the requirements of the Council. The Applicant had consideration for these requirements and full details were presented in the Railway Order application, including the accompanying drawings. No specific proposal with regards to that described above was tabled at the time.
- b) Pedestrian Overbridges Donabate, Rush and Lusk: In this regard, the Applicant would first note the safety reasons for installing the extended parapets on overbridges above railway lines with overhead lines (OHLE). The Applicant is obliged to comply with relevant European and Irish rail standards in this regard. The proposed detail attempts to limit the extent of solid panel as much as is possible within the requirements of the design standards. The height of the solid portion of the panel is restricted to the minimum height required (1.2m above footpath level). The portion above this is made as permeable as is allowed by adopting IP2X perforations (12.5 mm openings). This is assessed and described within Chapter 21 Architectural Heritage of the EIAR.

- c) Rush and Lusk: The substation building is a single storey, unobtrusive structure. The size of the substation building has been optimised to accommodate the electrical equipment required to provide power to the trains and minimise the building scale. The overall footprint of the building is 44.7m (L) x 11.3m (W) x 4.7m (H). Dividing the structure into separate units was not considered practicable. In the first instance, given safety considerations, a divided arrangement would significantly increase the overall footprint of the substation. Further, the various electrical components which are required, are extensively interconnected making construction, operation and maintenance much more complex if the substation was to be divided.
- d) Malahide: The Applicant notes that the proposed finish to the signalling equipment building (SEB) in this location is a yellow brick polychrome finish on all elevations, as detailed in Section 4.7.2.2 of Chapter 4 Description of the Proposed Development in the EIAR. This was chosen in keeping with the station building at Malahide. In respect of the location of the SEB, the proposed location has been chosen as it is the optimal location in the Malahide environs due to ease of accessibility, vehicle access considerations, and minimising the impacts on the loss of car parking spaces serving the station.
- e) Clongriffin: The proposed fencing arrangement is aligned with the requirements for securing the railway corridor. This is assessed and described within Section 4.5.8.1 of the EIAR. The Applicant would however have no objection to a condition specifying the use of Paladin rather than Palisade fencing in this location, to further mitigate any impact on architectural heritage.

5. Summary of Issue Raised

Fingal County Council notes in relation to impacts on residential amenity, the following:

“Key concerns identified relate to proposed construction compounds and substations in proximity to existing residential development, with particular regard to the following specific locations along the rail corridor:

Kilcrea/Corballis where an existing detached dwelling is located to the immediate south of the proposed compound and substation on lands zoned High Amenity within the FDP 2023-2029. The Kilcrea/Corballis Cottage Road is narrow in width and alignment.

Skerries South at Hacketstown where there is an existing detached dwelling located to the north/north-east of the proposed construction compound and substation within Greenbelt zoned lands. There are residential dwellings also sited north of the proposed compound and substation. The carriageway is narrow in width and alignment.

Skerries North where there is an existing detached dwelling and ancillary garden centre located to the immediate south of the proposed construction compound and substation. The adjoining road network is narrow in width and alignment.

Balbriggan South where there is an existing residential development, and a detached dwelling located immediately north of the proposed construction compounds on either side of the R127

Balbriggan Skerries Coast Road. These lands form part of the Castlelands Masterplan 2021 lands

The need to minimise the potential for adverse negative impacts of the proposed scheme on existing residential amenity should be carefully considered. Optimum setback relating to construction/substation compounds from existing residential development should be achieved. In addition, the construction, maintenance and operational impacts of construction compounds and substations should be carefully assessed in order to protect residential amenities from any potential adverse impacts.”

Response to Issue Raised

In the first instance, the Applicant notes that the OHLE will be supplied with electrical power from the ESB distribution network at regular intervals, and as a result, new electrical substations will be required at various locations between Malahide and Drogheda. Findings from a power study indicated that eight substations were required to provide power to the network and that these substations were required along the railway line in the following general locations:

- Donabate
- Rush and Lusk
- Skerries South
- Skerries North
- Balbriggan
- Gormanston
- Bettystown
- Drogheda

In selecting the sites for the substations (and their associated construction compounds) proposed for the DART+ Coastal North Project within these general locations, the Applicant followed the process set out in Chapter 3 Alternatives of the EIAR. As detailed in Chapter 3 and in Section 3.5.2 in particular:

“The siting of each substation within any general area has considered the following:

- *The land-use and development context of potential locations;*
- *The substations will be located adjacent to the railway line in the form of a fenced compound surrounding a single storey building which will house all the necessary electrical switching and feeding equipment;*

- *The substations will be connected to the local power distribution network and the OHLE system using insulated cables. These cables will be installed in buried routes for additional protection;*
- *The substations will need to be accessible from the local road network for construction and maintenance purposes; and*
- *The footprint of each substation compound and requirement for the building to house the electrical equipment for both IÉ and ESB.”*

During the site selection process, the various sites under consideration were also presented to Fingal County Council such that their views could be taken into account in the selection process.

An initial sub-station focussed meeting was held with Fingal Co Council on 27th January 2022, where each of the substation locations under consideration as part of the MCA were presented to members of the Council. The general requirements for each substation and key constraints relevant to the Council (Heritage, Planning and Zoning) were discussed for each substation location within the Fingal jurisdiction. This meeting allowed for key constraints to substation locations to be identified by Fingal Co Council.

A meeting focussed on the Balbriggan Substation, in relation to Fingal proposals at Bremore Park, was held with Fingal Co Council on 7th February 2022. This meeting provided further clarity on the Councils views on the possibility of locating a substation within the extents of Bremore Park.

Prior to the launch of Public Consultation No.2, a meeting was held with Fingal Co. Council where the preferred options for each of the substation locations within Fingal Co Council jurisdiction were presented to the Council. No significant concerns were raised during the meeting with regards to the locations or extent of landtake required. A meeting was held with Fingal Co Council on 26th September 2023 to focus on the proposed access and junction location relevant to the Skerries South substation off the Golf Links Road. The design was further refined following this meeting to ensure a suitable design was proposed.

Once the eight substation sites were selected, the design was further developed, and a detailed environmental assessment was undertaken as presented in the specialist chapters of the EIAR. This included development of the permanent and temporary access arrangements for the substations (and compounds) in accordance with all relevant best practice guidance, as well as consideration of nearby receptors, both for the construction and operational phases of the Project, in respect of residential amenity, noise and other factors.

In respect of the key points raised above, the Applicant responds as follows:

1. **Kilcrea/Corballis** – From the outputs of the power study, the area under consideration for a substation at Donabate extended from directly south of the overbridge for the R126 to the northern boundary of Donabate station car park. Four feasible options were considered, with the preferred option for the Donabate substation located on agricultural land south of the R126, west of the railway line, as detailed in the Options

Selection Report Volume 2, Technical Report – see Section 5.6.1 of that report. The MCA concluded that Option 1 (preferred option) was to locate the substation within agricultural land south of the R126, west of the railway line. It was acknowledged that an access road would be required from the lane south-west of the proposed location. Design development ensured that impacts were minimised to the extent possible and engagement with the landowner during this design development led to a revised layout and access arrangement. It is also noted that no feedback has been received during any public consultations from the owners of the property to the south of the proposed substation.

The detailed assessment in the EIAR took account of the potential for construction and operational impacts associated with the substation in this location. It is acknowledged in the EIAR that the substation at Donabate is located within a designated High Amenity Area in Fingal. The detailed layout plan at Drawing No. D+WP56-ARP-P4-NL-DR-RO-000510 (Specific Locations-05_Donabate) included in the Railway Order application, shows landscape proposals including along the new access road and around the sub-station and a large area of new native tree and shrub planting for screening from the residential property to the south.

Photomontages showing the proposed substation at Donabate have also been prepared and are included in the EIAR – Photomontage D02, Figure 15.3.16.2 in Volume 3B of the EIAR. It is acknowledged that the proposed substation will introduce a new utilitarian structure into the landscape, resulting in some degradation of the landscape and visual amenity. In terms of mitigation, Chapter 15 Landscape and Visual Amenity, Section 15.6.3 proposes appropriate native planting to the perimeter of the substation to screen the proposals from the surrounding High Amenity designation; as a result, no significant residual effects on amenity designations are predicted.

No significant effects from noise and vibration are predicted in respect of the substation, as detailed in Chapter 14, Noise & Vibration of the EIAR. The future design and installation of stationary systems will include measures such as attenuators, acoustic louvres, screening, anti-vibration mounts and others to avoid significant adverse noise effects. The construction phase will be undertaken in accordance with the Construction Environmental Management Plan (Appendix A5.1 of the EIAR) which includes appropriate mitigation measures to minimise the impacts from noise and vibration during the construction stage. This CEMP will be further developed in consultation with Fingal County Council prior to construction.

In respect of the narrow road, it is noted that in the operational phase, traffic to this substation will be very light as it will largely be unmanned, save for ongoing operation and maintenance activities. A Construction Traffic Management Plan (CTMP) has been prepared and included with the Construction Environmental Management Plan (CEMP) in Appendix A5-1 in the EIAR. This will be further developed in consultation with the relevant authorities, including Fingal County Council, prior to construction, to

ensure that the Proposed Development can be constructed with the minimum impact on traffic and transportation and to ensure road safety is maintained.

2. **Skerries South at Hacketstown** – from the output of the power study, the area within which the substation needs to be located extended from agricultural land east of the southern boundary of Skerries Golf club to agricultural land directly north of the overbridge for Golf Links Road. Within this area, three feasible options were identified for the location of the substation, as detailed in the Options Selection Report, Volume 2 Technical Report – see Section 5.6.3 of that report. The preferred option, following the detailed MCA was to locate it on agricultural land, east of the railway and directly south of Golf Links Road.

Design development ensured that impacts were minimised to the extent possible and engagement with the landowner during this design development led to a revised layout and access arrangement. The detailed assessment in the EIAR took account of the potential for construction and operational impacts associated with the substation in this location. The potential effects on residential properties in proximity to this substation are acknowledged and assessed in Chapter 15 Landscape and Visual Amenity of the EIAR (see Section 15.5.2.2.8 in particular and Photomontage S4, Figure 15.3.27.2 in Volume 3B of the EIAR). Mitigation is proposed with the provision of replacement planting along Golf Links Road and new native tree and shrub planting along the perimeter of the proposed substation, to limit effects on amenity of road, adjacent residential property and Skerries Golf Course. With the implementation of this mitigation, no significant landscape and visual effects on properties in this area are predicted.

No significant effects from noise and vibration are predicted in respect of the substation, as detailed in Chapter 14, Noise & Vibration of the EIAR. The future design and installation of stationary systems will include measures such as attenuators, acoustic louvres, screening, anti-vibration mounts and others to avoid significant adverse noise effects. The construction phase will be undertaken in accordance with the Construction Environmental Management Plan (Appendix A5.1 of the EIAR) which includes appropriate mitigation measures to minimise the impacts from noise and vibration during the construction stage. This CEMP will be further developed in consultation with Fingal County Council prior to construction.

In respect of the narrow road, it is noted that in the operational phase, traffic to this substation will be very light as it will largely be unmanned, save for ongoing operation and maintenance activities. A Construction Traffic Management Plan (CTMP) has been prepared and included with the Construction Environmental Management Plan (CEMP) in Appendix A5-1 in the EIAR. This will be further developed in consultation with the relevant authorities, including Fingal County Council, prior to construction, to ensure that the Proposed Development can be constructed with the minimum impact on traffic and transportation and to ensure road safety is maintained.

The Project team has engaged directly with this property owner since it became apparent that lands registered to them would be impacted by the Project boundary. Initially, as part of a wider mail-out to all properties in the Project area, a leaflet was distributed to this property at the start of PC1 in Q3 2022. A letter and leaflet were sent to the landowner following identification of substation locations as part of PC2 documentation in Q2 2023, notifying them that their property was within the extents of the Project boundary. Prior to this notification there had been consultation with the landowner in relation to permission to carry out environmental surveys on their lands.

A summary of key communications is presented below to demonstrate the efforts to engage with the landowner:

- 2023.05.25: Initial landowner consultation meeting to discuss PC2 proposals. The meeting led to some design revisions.
 - 2023.09.15: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some further design revisions.
 - 2023.10.02: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some final design revisions.
 - 2023.10.20: Email containing revised layout sent to all members of the Dowling Family relevant to the registered lands.
 - 2023.20.26: Email from Carmel Dowling to DART+ Coastal North noting agreement with the design proposed in email sent on 2023.10.20.
3. **Skerries North** – from the outputs of the power study, the area under consideration for a substation at Skerries North extends from agricultural land 250m southeast of Barnageeragh Bay Steps to woodland on the south-eastern tip of Argillan Castle land. Four feasible options were considered as detailed in the Options Selection Report, Volume 2 Technical Report – see Section 5.6.4 of that report. Two options were brought forward to MCA and the preferred option, following the detailed MCA was to locate the substation on agricultural land 250m southeast of Barnageeragh Bay Steps, west of the railway. The substation is positioned close to the railway corridor, blocking the current access road to the farmland directly south of the proposed substation. An access road will be required from Barnageeragh Rd to allow access to the farmland to the south to be maintained.

Design development ensured that impacts were minimised to the extent possible and engagement with the landowner during this design development led to a revised layout and access arrangement. We have also consulted with the landowners on both sides of the substation site and no substantive issues were raised, other than general concerns about potential construction impacts. The detailed assessment in the EIAR took account of the potential for construction and operational impacts associated with the substation in this location.

The EIAR, in Chapter 15 Landscape and Visual Amenity, acknowledges that for residential receptors, there will be continuing effects from loss of vegetation removed during the construction phase and provision of new utilitarian structures into views, as well as more notable visual effects on residential properties adjacent to (for example) Skerries North substation. Photomontage S5, Figure 15.3.28.2 in Volume 3B of the EIAR illustrates this. To mitigate the potential effect, it is proposed to provide perimeter planting to the substation, to limit effects on surrounding residential receptors. With the implementation of mitigation measures, no significant landscape and visual effects on residential properties in the area are predicted.

No significant effects from noise and vibration are predicted in respect of the substation, as detailed in Chapter 14, Noise & Vibration of the EIAR. The future design and installation of stationary systems will include measures such as attenuators, acoustic louvres, screening, anti-vibration mounts and others to avoid significant adverse noise effects. The construction phase will be undertaken in accordance with the Construction Environmental Management Plan (Appendix A5.1 of the EIAR) which includes appropriate mitigation measures to minimise the impacts from noise and vibration during the construction stage. This CEMP will be further developed in consultation with Fingal County Council prior to construction.

In respect of the narrow road, it is noted that in the operational phase, traffic to this substation will be very light as it will largely be unmanned, save for ongoing operation and maintenance activities. A Construction Traffic Management Plan (CTMP) has been prepared and included with the Construction Environmental Management Plan (CEMP) in Appendix A5-1 in the EIAR. This will be further developed in consultation with the relevant authorities, including Fingal County Council, prior to construction, to ensure that the Proposed Development can be constructed with the minimum impact on traffic and transportation and to ensure road safety is maintained.

4. **Balbriggan South** – the temporary construction compounds on either side of the railway in this location relate to a utility diversion (medium voltage power line) and undertrack crossing (UTX) required as part of the DART+ Coastal North Project. As per Chapter 5 Construction Strategy, the lines that cross the railway in this location to the south of Balbriggan are planned to be diverted via UTXs. A work area, compounds and access routes have been allocated for the diversion and the removal of the existing lines. The existing field accesses off Skerries Road and Tanners Water Lane would be used to access the agricultural land areas. The new cable route partially follows the R127 which would need to be reduced to a single lane under traffic management for the duration of the works in that area, likely several weeks. To decommission the existing line to the north, the back garden of a property on Derham Park will need to be accessed and the R127 will need to be under traffic management. Similarly, the R127 will need to be under traffic management to decommission the line to the South. All of these works have been assessed in the EIAR and no significant residual effects are predicted.

Consultation with both the landowner and Fingal County Council (re Bremore Park) was undertaken as the design was developed.

The FCC submission also notes that these lands form part of the Castlelands Masterplan. The Applicant notes that this masterplan was published in 2021, outlining Fingal County Council's vision for future development in Balbriggan, though no specific layouts or consents have been formalised to date.

The two proposed UTXs are required to facilitate utility diversions as part of the DART+ Coastal North Project, which is essential to delivering enhanced public transport services to support sustainable growth in the area. The main impacts associated with the UTXs will be temporary and limited to the construction phase. Comprehensive mitigation measures, including traffic management plans, have been developed to minimise disruption during the works.

The Applicant remains committed to ongoing collaboration with Fingal County Council to ensure alignment with the Castlelands Masterplan and to support sustainable community growth in Balbriggan.

6. Summary of Issue Raised

In relation to impacts on Strategic Residential Lands, the Fingal County Council submission notes that: *"Where the proposed scheme interfaces with existing and new large scale residential development along the route, the need to protect the amenity of these areas and to provide for connectivity to high quality public transport nodes and corridors is paramount. The design must respect and enhance the surrounding environment. In this regard, it is noted that large scale residential development permitted or proposed adjoining Clongriffin Train Station and within the Portmarnock South and Donabate Local Area Plan lands and within the Castlelands Masterplan lands adjoining the rail corridor should be carefully considered."*

Response to Issue Raised

Early engagement was undertaken with Fingal County Council to ensure that appropriate consideration could be given to any planning policy requirements of the local authority, through the site selection process. This engagement continued through the design development phase, with numerous meetings held with the local authority to identify any concerns the local authority may have.

The DART+ Coastal North Project is intended to provide the infrastructure which will enable the extension of the electrified rail network between Malahide and Drogheda, to extend the DART service from Malahide and Drogheda and to increase the capacity and frequency of service on the Northern Line. It also aims to increase the capacity and frequency of service on the Howth Branch line. To that end, it provides for connectivity to high quality public transport nodes and corridors.

The design development was at all times cognisant of the need to protect the amenity of the areas along the route, including large scale residential development. This included consideration of the large-scale residential development permitted or proposed adjoining Clongriffin Train Station and within the Portmarnock South and Donabate Local Area Plan lands and within the Castlelands Masterplan lands. Chapter 26 Cumulative Effects of the EIAR considers the potential for cumulative effects of the Proposed Development in combination with other planned and permitted development. This included an assessment (Tier 1 – see Section 26.4.1 of Chapter 26) of a range of policy documents (including those above) which may have a cumulative effect with the proposed DART+ Coastal North Project. Where significant residual cumulative effects are predicted, these are set out in Section 26.6 of the EIAR.

The Applicant has considered throughout the site selection and design development, the interfaces of the proposed DART+ Coastal North Project with nearby existing and planned residential development. The potential for impacts on these developments has been assessed in the EIAR, in particular, in Chapter 6 Traffic and Transportation, Chapter 7 Population, Chapter 12 Air Quality, Chapter 14 Noise and Vibration and Chapter 15 Landscape and Visual Amenity.

Significant consultation with planned developments in the Clongriffin area has also been undertaken, particularly where the Proposed Development interacts with such planned developments (e.g. to the east of the station in Clongriffin) and agreement has been reached as to how such developments can proceed with the DART+ Coastal North Project, minimising conflicts between and effects on both developments.

7. Summary of Issue Raised

In respect of Howth Junction & Donaghmede Station, the submission notes that: “*The FDP Plan 2023-2029 includes map-based Local Objective 88 which seeks to, 'Promote the improvement of access to Howth Junction Rail Station'. Any alterations to the area near the train station should be discussed with Fingal County Council to allow for future plans to be developed.*”

Response to Issue Raised

The Applicant notes that accessibility is an important aspect of the design of the DART+ Programme. A variety of significant modification works are proposed to Howth Junction and Donaghmede Station in particular to both improve the passenger experience generally, and to develop the station to better serve as an interchange station into the future. These works are confined to the station itself and do not extend to areas outside the station area.

The proposed works will involve modifying the entrances to provide a more accessible, user friendly and customer focused station for all rail users, as well as improving the connection to the surrounding areas of Donaghmede and Kilbarrack. Upgrades to the existing footbridge and connections to the centre platforms, stair cores and lifts will also be carried out, as well

as upgrades to lighting, signage, and finishes throughout. Further clarification and detail on the proposed upgrades are provided in our response in Section 2.3.1.6 of this report.

No alterations are proposed as part of DART+ Coastal North to the area near the train station. If such alterations are being considered under other projects, Iarnród Éireann will discuss with Fingal County Council as requested.

8. Summary of Issue Raised

In relation to the existing local access bridge north of Moyne Road and South of Portmarnock Station, the submission noted that *“the existing local access bridge can provide for sustainable/active travel linkage as development occurs on both sides of the railway line into the future. Any proposed alterations to this bridge by Iarnród Éireann should facilitate this connection.”*

Response to Issue Raised

No alterations are proposed for this bridge as it is not impacted by works associated with the DART+ Coastal North Project. The line is already electrified at this location and the localised modification works associated with Clongriffin Station do not extend to the location of this bridge.

9. Summary of Issue Raised

In relation to Enhanced School Connectivity, the submission notes that *“Map based Local Objective 51 of the FDP 2023-2029 seeks to, ‘Provide for a walkway and cycleway across the rail line for Malahide Community School’. Any alterations to the area near the train station should be discussed with Fingal County Council to allow for future plans to be developed.”*

Response to Issue Raised

The Applicant notes that Map based Local Objective 51 of the FDP 2023-2029 is located south of Malahide Station. No works are proposed in the vicinity of this proposed local objective that would materially impact on the future plans of Fingal County Council in this regard.

10. Summary of Issue Raised

In relation to implications for the Broadmeadow Way the submission notes that Fingal County Council is delivering this scheme in collaboration with Iarnród Éireann and with the support of the National Transport Authority. It notes that Fingal County Council *“is supportive of the positioning of the new railway siding at Malahide Station and acknowledge that the proposed closure of the existing level crossing at Kilcrea is of benefit to the Broadmeadow Way”*. It further notes the following in respect of this permitted development:

- a) *“The Broadmeadow Way greenway should be kept open and operational during the construction phase of the proposed Dart+ upgrade works. Space on the southern causeway and at Bissett’s Strand should be kept available at all times to achieve a minimum width of greenway of 3.0m during the construction phase of the Dart+ Malahide turnback. A minimum width of 5.0m should be kept available for the permanent Broadmeadow Way greenway on the southern causeway”.*

- b) *The Dart+ upgrade Proposed Development boundary on the south side of Bissett's Strand encompasses an area that forms part of the permitted Broadmeadow Way scheme. This area is proposed by the Dart+ upgrade project to facilitate plant and vehicle movements for the Dart+ upgrade works. To minimise impact on the completion of the Broadmeadow Way scheme, Fingal County Council requests that the proposed turning area for vehicles for the Dart+ upgrade be reconsidered, noting that this particular area was not required for the construction of the main estuary bridge as part of the Broadmeadow Way scheme as vehicles had to travel from the west and into the compound thus negating the need for any turning on Bissett's Strand.*
- c) *Fingal County Council notes that through engagement between the Dart+ team and the Fingal County Council Broadmeadow Way project team, it was agreed that the proposed OHLE masts on the northern causeway will not be located on the west side of the railway but instead will be located on the east side of the railway and cantilever over the railway. This is required to allow the maximum achievable width for the permitted Broadmeadow Way on the northern causeway. The proposed drawings do not appear to align with that agreement. Fingal County Council ask that proposed OHLE masts be located to the east of the railway on the northern causeway."*

Finally, the submission notes that *"the imposition of appropriate conditions, as necessary to address the foregoing would be welcomed by the Planning Authority."*

Response to Issue Raised

The Applicant agrees that a collaborative approach has been taken throughout with regard to the development of the Broadmeadow Way and the DART+ Coastal North Project and has been grateful for the engagement with Fingal County Council in this regard. Consultation with Fingal County Council prior to the Railway Order application submission ensured agreement in principle on a number of issues, as detailed in Section 5.5.3.2 of Chapter 5 Construction Strategy of the EIAR. Responses to the specific issues raised are provided below:

- a) The Applicant is committed to ensuring that the Broadmeadow Way greenway is kept open and operational during the construction phase of the proposed DART+ Coastal North Project and has designed and planned the scheme accordingly. The Applicant will also maintain space on the southern causeway and at Bissett's Strand at all times. However, in consultations with Fingal County Council, the Applicant had agreed in principle a minimum permanent width of 5m and a minimum temporary width of 2m, not 3m as detailed in the submission, during the construction phase. It is noted that this minimum 2m width would only be required over a relatively short length that would move along with the section of modular wall being constructed. It is therefore requested that the 2 m width as detailed in the Railway Order application is retained in any Railway Order granted.
- b) The turning requirement is foreseen as a result of the restricted haul road width. As the access to the site will be from the west only, the plant and vehicles will need to turn at least once due to space restrictions, i.e. the vehicles will need to reverse up the haul

road or reverse out of the haul road. Therefore, there needs to be adequate space for the vehicles to turn without significant traffic management impacting on the public on Bisset's Strand. The Applicant therefore is not in a position to change this requirement, and it is requested that the requirements as set out in the Railway Order application are included in any permission.

- c) The Applicant notes that the agreement for the proposed OHLE masts on the northern causeway to be located on the east side of the railway and cantilever over the railway is reflected on the Non-technical summary drawing 11/2, extract shown below. The Applicant therefore has no objection to this proposal being conditioned by An Bord Pleanála, should it grant the Railway Order.

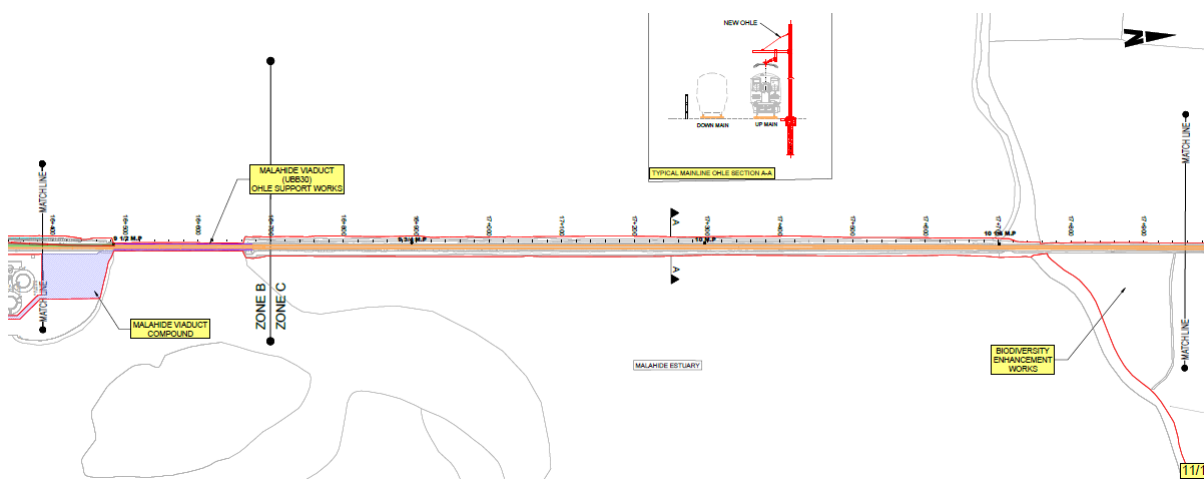


Figure 7 – Extract from Drawings in Non-Technical Summary illustrating proposed OHLE works north of Malahide Viaduct

11. Summary of Issue Raised

In relation to Rush and Lusk Train Station, the Fingal County Council submission notes that *“the Fingal Development Plan contains objectives to improve pedestrian and cycle facilities between Rogerstown Park and Lusk and between Rush and Lusk and the train station. Any development near the train station should be carried out to allow for future pedestrian/cycle linkage and in close consultation with Fingal County Council’s Planning & Strategic Infrastructure Department.”*

Response to Issue Raised

The Applicant has consulted with Fingal County Council at various stages throughout the design development in respect of the proposals under DART+ Coastal North in the vicinity of Rush & Lusk Station. No development is proposed west of the station on the R128. To the east of the station on the R128, we have incorporated upgraded pedestrian/cyclist access through the provision of an upgraded station entrance and junction to the east of the railway (this junction is proposed to provide access to the proposed substation). These works have

been incorporated to ensure that the development allows for future pedestrian/cycle linkage, in consultation with Fingal County Council.

12. Summary of Issue Raised

In relation to Balbriggan Station and Surrounds, while Fingal County Council acknowledges that the improved service to be provided by DART+ Coastal North will complement the significant investment being made in Balbriggan Town Centre, the submission notes concern raised in respect of the proposed construction compound to the west of the viaduct and in particular notes that:

This area to the west of the viaduct “is currently being developed as part of a public realm scheme that will enhance this area, the area around the viaduct and the vicinity of the harbour. This Project was subject to a public consultation and planning process under Part VIII of the Planning & Development Act 2000 as amended and was approved to proceed by the members of Fingal County Council at their meeting on 10th October 2022 and the submission received from CIE at the time references the intention for an agreement in principle regarding co-ordination between the Public Realm and the Dart+ Projects. The submission did not clearly define the overall extent and nature or impacts of a temporary compound for the Dart+ Project at this location on the public realm proposal”. It goes on to note that this public realm project is currently under construction with a contract completion date of 2025 and raises the following key issues:

“The design, high quality materiality and development cost (in excess of €25M Euro) of this extensive new public area should not be forced to accommodate the provision of a space for a construction compound. The proposed use of the area outlined as a construction compound would severely impact the intended use of the newly developed public realm as a key driver in the rejuvenation of Balbriggan, offering improvements in biodiversity, enhanced facilities, and better access to beach and harbour”.

“the proposed compound location site is the location of a recently completed upgrade of Uisce Éireann underground pumping station requiring permanent emergency maintenance access and with loading restrictions. These loading restrictions will of themselves place a severe restriction on any potential access or construction activity on grounds above the pumping station networks currently under construction with a contract completion date of 2026”.

“Fingal County Council is of the understanding from contact with CIE that the works that are necessary at the viaduct are very specific to the viaduct, will require “an area substantially smaller than those indicated in the property referencing drawings” and will be required “on a temporary, short-term basis”, “probably no longer than a couple of months”. (Appendix 1- email correspondence from CIE dated 17th July 2024). The actual requirement for a works site compared to the lands indicated in the Railway Order is also depicted in an update presentation slide title “Balbriggan Viaduct – Proposed Works and Compound.” (Appendix 1 – Dart + - Arup / CIE slide). The temporary acquisition of this area of the redeveloped Quay Street Environs and Harbour area as a compound is considered disproportionate for the works

requirement in the first instance, excessive in terms of the actual area required for those works and unduly onerous given the legal processes and likely cost that will arise given the short duration of the works requirement. The inclusion of the proposed compound area at the Quay Street environs in the Railway Order is also considered unnecessary given that the works and any necessary work site can be accommodated through the normal licensing processes that fall within the Council's statutory authority. It is proposed therefore that the area to be designated as "a temporary construction compound" (Work Layout Plan 17 & 17.17 of the First Schedule) be excluded from confirmation of the Railway Order and that CIE enter into discussions and an agreement with Fingal County Council for licencing to conduct the works. In the event that this area is to be included in confirmation of the Railway Order then a condition should be applied requiring details of the proposed temporary work compounds to be agreed with Fingal County council and for full reinstatement in line with the requirement of Fingal County Council."

Response to Issue Raised

The Applicant is very aware of the Proposed Development of this area by Fingal County Council and has consulted with the Council throughout the design development (as referenced above) to ensure any impacts on this development during the construction phase are minimised to the extent possible. Details of this consultation are provided below:

- 2022.07.28_Meeting with Fingal County Council - North County Area regarding initial proposals for Construction Compounds & Construction Access Routes
- 2023.03.07_Meeting with Fingal County Council Heritage & Conservation regarding the proposed works to viaduct structures within Fingal Jurisdiction, inclusive of the Balbriggan Viaduct.
- 2023.04.26_Meeting with representatives of Fingal County Council to provide a pre-PC2 update on the Preferred Option.
- 2023.09.05_Fingal County Council Conservation Meeting regarding works to listed structures.
- 2023.11.24_Post PC2 Project Updates. The meeting provided details of proposals for Balbriggan Viaduct and the need for and extents of construction compound.
- 2024.08.02_Meeting with Fingal County Council regarding the Balbriggan Viaduct Compound.

This compound is a critical logistics hub for the successful delivery of structural improvements on the Balbriggan Viaduct, which consists of the replacement of pedestrian walkway spans, installation of new elastomeric bearings, placement of overhead line equipment (OHLE) masts, and other viaduct upgrades. Access to the compound from the M1 motorway is via the R122. Local access within Balbriggan follows a one-way system along Quay Street and Mill Street.

The Applicant is aware that changes to this one-way system may occur due to redevelopment plans. It is noted that in the future public area, direct access from Quay Street will no longer be available. Therefore, the compound has extended to the road to safeguard access in future.

Harbour Road will need to be closed overnight or on weekends to facilitate crane operations for structural lifts. A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included with the Railway Order application (Appendix A5-1 of the EIAR). This includes measures to manage and mitigate environmental impacts during construction, including potential noise, vibration and air quality impacts. A Construction Traffic Management Plan (CTMP) has also been prepared and included in the CEMP. The CEMP (and CTMP) will be further developed by the Contractor prior to construction in consultation with the relevant local authorities, so as to minimise disruption. Appropriate precautions to avoid any contamination or disruption to the Matt Arterial Drainage Scheme (Bracken River) will be undertaken. The compound and viaduct works will aim to maintain pedestrian connectivity across the bridge throughout. If sections need to be closed, alternative routes will be provided.

While the Applicant understands the concerns of Fingal County Council, the inclusion of this compound and works area within the Railway Order is required in order (if the Railway Order is granted) to access and implement the works needed in this area as part of DART+ Coastal North. The Applicant remains committed to working with Fingal County Council throughout the further design development and construction stage to minimise the potential impacts during the construction phase in this location.

The Applicant has listened to FCC in terms of minimising the compound size to the extent possible. This may be feasible, and we remain committed to engaging with FCC in this regard, to assess what is possible and can be agreed with FCC.

12. Summary of Issue Raised

In relation to impacts on Level Crossings, the Fingal County Council submission notes that *“the increased frequency of level crossing closures on the Howth branch line will create delays to pedestrians, cyclists, and motorists on the local road network, including on the proposed Sutton Malahide Pedestrian and Cycle Route. Fingal County Council welcomes any improved coordination of train movements to minimise delays in this regard, and any future consideration of infrastructural interventions at these locations to address connectivity and severance issues.”*

Response to Issue Raised

As detailed in the response under Section 2.3.1.3 herein, a detailed assessment of the four existing level crossings and surrounding network along the Howth Branch has concluded that these level crossings can continue to operate and provide an appropriate level of cross connectivity and accessibility whilst still meeting the increased DART service frequency requirement. The increased frequency and duration of level crossing closures will result in a greater likelihood of vehicles, pedestrians and cyclists being required to queue at the crossings, however, the traffic modelling has shown that queue lengths are likely to remain within the available queueing road space. Hence, additional infrastructural interventions at the four level crossings are not considered necessary.

However, in order to mitigate against potential blocking back of queues from Kilbarrack (Baldoyle Road) and Sutton Level Crossing it is proposed to provide yellow box markings at the Dublin Road & Sutton Road junctions to prevent the junction from being blocked and impacting on vehicular and public transport movements. Yellow box markings are already provided at all other major junctions along Sutton Road and Baldoyle Road. Significant effects may also be experienced by pedestrians and cyclists during abnormal highly trafficked days, for example at Cosh Level Crossing near Burrow Beach. On extremely busy days, an Garda Síochána will continue to have a presence at the level crossings (Section 6.6.2.1 in Chapter 6).

It is acknowledged that the effect on traffic and transportation in terms of general traffic is expected to be a negative, moderate, medium-term effect on the whole. On highly trafficked days, for example during the summer months, queues are more likely to block back at Kilbarrack (Baldoyle Road) and Sutton Level Crossings. On these days the effects on abnormally high levels of traffic can be classified as a negative, significant, medium-term effect (Section 6.5.2.4.3 of Chapter 6).

Again, the above takes no account of the likely positive impact that optimised and increased rail services, and the implementation of the Climate Action Plan agenda will have on vehicular traffic, such that traffic levels will reduce or remain at current levels over time.

A detailed response in respect of the potential for improved co-ordination of train movements to minimise delays at level crossings is provided in Section 2.3.1.4 herein. As detailed therein, the level crossing closures are highly sensitive to the exact meeting point of trains in any given scenario; having trains cross simultaneously is the best case, as it allows two trains to pass for one closure. By contrast, the worst-case scenario would be two trains separated by a short period of time (e.g. approximately 20 seconds or less), meaning that the level crossing will be held down for the maximum amount of time.

The potential to delay trains to better coordinate with the operation of the crossing, for example to intentionally delay trains so that both directions pass the level crossing at the same time, and that level crossing closures are therefore limited, was investigated (Appendix A6.1, Section 3.4 of the EIAR). In all modelled scenarios there will only be one set of trains per direction passing each other at the same time, and therefore the closure times can only be optimised for one crossing, resulting in the other crossings potentially having more frequent and/or longer closure times.

13. Summary of Issue Raised

The Fingal County Council submission notes the possible conflict between some of the construction compounds proposed by DART+ Coastal North and either planned or ongoing projects, including active travel schemes. Unless concern is raised elsewhere in this response, Fingal County Council notes that it would welcome further engagement and co-operation with Iarnród Éireann regarding the proposed site compounds and to avoid any conflicts between the DART+ Coastal North Projects and these schemes.

Response to Issue Raised

The Applicant is committed to ongoing engagement with Fingal County Council and other relevant parties to ensure that the DART+ Coastal North Project can be designed, constructed and operated with minimal impact on the environment, local communities or other planned/proposed schemes.

A detailed cumulative assessment has been undertaken and was presented in the Railway Order application, see Chapter 26 Cumulative Effects, of the EIAR. This assessed the cumulative effects arising from the proposed DART+ Coastal North Project with other existing and/or approved plans and projects.

14. Summary of Issue Raised

The submission from Fingal County Council notes the following in respect of station design:

1. Howth Junction & Donaghmede Station – *“Fingal County Council welcomes any design that supports enhanced security of stations through passive safety, improved passenger facilities and services and CCTV where necessary. This would apply to all stations but in particular, the proposed Howth Junction-Howth service, which will result in passengers having to change trains. In the past, the local authority would be aware of passengers having been deterred from using Howth Junction Station due to perceived security concerns. It is understood that these types of issues can be addressed through high quality station design, adequate staffing and security arrangements, and Fingal County Council would welcome this being developed as the Project moves forward and these concerns are addressed in consultation with the community.”*
2. Malahide Station - *‘The scheme shall ensure that the works within Malahide Train Station as viewed from the estuary would be sympathetic to the surrounding sensitive environment’.*
3. Cycling and Pedestrian Facilities – *“Significant high quality secure cycle parking storage should be provided at each station as part of the DART+ Coastal North Project. The facilitation of active modes such as walking and cycling is a key objective of Fingal County Council and, in collaboration with the National Transport Authority, several significant cycling and walking infrastructural projects are being implemented in Fingal along the Northern line corridor. The provision of appropriate bike parking facilities will complement these measures. In this regard, Chapter 14 Development Management Standards of the FDP 2023-2029 sets out the required bicycle parking standards. A coordinated approach to active and sustainable transport between the local authority and transport providers is essential with regard active travel. Adequate secure bike parking and bike storage at stations are essential for sustainable transport. Connectivity to local destination points is key to Active Travel movement to and from any railway stations and we look forward to engaging on this further with Iarnród Éireann.”*

Response to Issue Raised

The Applicant responds to each of the above issues as follows:

1. Concern was raised throughout the non-statutory public consultation process about security and anti-social behaviour at Howth Junction and Donaghmede Station. The Applicant has listened to the concerns of the public in this regard and has responded directly to this concern in developing the design for DART+ Coastal North. A variety of significant modification works are now proposed, as detailed in Section 4.7.3.1 of the EIAR and the accompanying Railway Order drawings, to “*both improve the passenger experience generally and to develop the station to better serve as an interchange station.*” As detailed therein, “*the station works will also involve modifications to the station entrances to provide a more accessible, user friendly and customer focussed station for Donaghmede and Kilbarrack. Upgrades are proposed to the station footbridge and connections to the centre platforms, as well as to the lighting, CCTV system, signage and finishes throughout. The improvement at the Donaghmede entrance will also provide direct access to Platform 4 and connectivity via the footbridge.*” The interchange at Howth Junction & Donaghmede station will also be facilitated by an increase in Northern Line stopping trains which will minimise wait times for connecting services. These measures will significantly improve customer experience and minimise any concerns in respect of security and anti-social behaviour.

In more general terms, Iarnród Éireann continue to work to provide a safe rail network for all users. The majority of train users travel without incident. Iarnród Éireann actively monitors the network to help create a safe travel and work environment for both Iarnród Éireann staff and customers. Significant resources are put into security with €5.7m spent on these measures in 2021, up from €3.7m in 2016.

There are a range of existing measures in place across the DART and Commuter network designed to help mitigate against anti-social behaviour (ASB), including:

- A TEXT alert system is in place on trains (51444 TRAIN) for members of the public to report incidents of ASB in real time so assistance can be dispatched as needed. This will feed into the recently established NTA Customer Consolidated Call Centre which will include additional Real Time Alert options including WhatsApp.
- Joint operations with Gardaí have proven most effective and are planned to continue. The roll out of Garda Response Hubs around the network to assist on-board staff to deal with problematic passengers have provided much peace of mind to passengers and staff alike. Additionally, four Garda Interchange Hubs have been established with Public Transport Operators across the GDA. Iarnród Éireann regularly work closely with An Garda Síochána (AGS) in targeted joint operations to address issues of anti-social behaviour on the network and the issuing of fixed penalty notices where appropriate. Garda Liaison Officers have been appointed in each Garda Division to liaise with IÉ Managers. Moving

forward, Iarnród Éireann will be co-locating with (AGS) in the new National Train Control Centre at Heuston Station.

- CCTV at all stations is monitored in real time by a team from our security monitoring centres. The security monitoring rooms actively monitors the DART and Commuter stations CCTV across the wider network, and the supervisory team coordinates the security response in the Greater Dublin Area as required.
 - Teams of security operatives patrol the network to ensure the safety and security of our customer and staff members.
 - Fare evaders are targeted by the Revenue Protection Officers (RPOs) ensuring issue of fare penalty notices.
 - Iarnród Éireann, in conjunction with An Garda Síochána, now have a team specifically dedicated to targeting and addressing crime and ASB on our Network, to ensure that those who are engaged in criminal activity are brought before the criminal courts.
 - In order to increase safety at Level Crossings for both Rail and Road users, An Garda Síochána, in cooperation with Iarnród Éireann, have commenced a programme to enforce speed and red light running under the Road Traffic Acts at High Risk Level Crossings.
2. The Applicant would first note that the works within Malahide Station will not be visible from the estuary. The works proposed within the station are relatively minor in scale comprising a new signalling equipment building and the replacement/upgrading of overhead line equipment (OHLE) and signalling/telecoms. The design development was carried out in close collaboration with landscape and visual amenity and architectural heritage specialists. As detailed in Chapter 4 Description of the Proposed Development of the EIAR (Section 4.7.2.3), the new SEB building will measure 10.0 x 4.0 x 4.0m (length x width x height) and will be mostly located within the existing IÉ land boundary. The proposed architectural finish was proposed to be yellow brick polychrome finish on all elevations, complimentary with the adjacent station building, with profiled metal roof sheeting, mono pitch.
- Detailed assessments were carried out and are presented in the EIAR, in Chapter 15 Landscape and Visual Amenity and Chapter 21 Architectural Heritage. No significant effects were identified.
3. The Applicant notes that, while the proposed upgrade to Howth Junction & Donaghmede Station is to improve passenger experience and better prepare the station to act as an interchange station, provision has been made below the stairs in the station entrances, for secure bike storage to be provided for passengers to encourage active travel and give a direct link from the bike storage into the station.

Outside of this provision (which forms part of the wider upgrade works at Howth Junction & Donaghmede Station), works to improve pedestrian and cycle connectivity to stations and the public realm are not included in the DART+ Coastal North Project. However, as detailed in the EIAR, Chapter 26 Cumulative Effects (Table 26-6 Cumulative Assessment of DART+ Coastal North with Other projects), there are other parallel projects which are looking at these aspects.

As detailed within the above referenced table, the DART Station Enhancement Project at the time of the Railway Order application submission *“is appointing consultant services to review the future requirements at DART stations. The objective of the Project initially is to produce a study that will recommend how DART stations (current and proposed network) should be enhanced into the future to provide an improved customer experience, whilst also considering the increasing passenger demand capacity challenges that will be introduced in the future. It will outline the most effective method to enhance DART stations into the future considering the provision of increased services under the DART+ Programme and all other ongoing projects/programmes with an aim of making DART stations more attractive to the customer. The early elements of this Project (focussing mainly on capacity issues associated with future passenger numbers will be progressed in 2024, and subject to funding will be progressed thereafter.”*

In the same table in the EIAR, reference is made to the Multimodal Interchange Project, which will *“assess all stations throughout the network with a view to implementing its strategy at stations where there is a need for modifications that will have an impact on multimodal travel and station access. The Project aims to improve the integration and accessibility of the public transport network for stations and communities across the network, through the provision of multimodal interchanges. This Project will assess a variety of multimodal options at stations including but not limited to the provision of secure bicycle parking and shared mobility services. The Strategy relating to this Project was completed in 2023 and is currently with the NTA for review and approval. Subject to approval and funding the Project will move to the next phase and eventual delivery of the solutions identified.”*

It is anticipated that both of these projects would provide an improved passenger experience and greater functionality and connectivity to provide more sustainable transport and thereby reduce carbon footprints. The Applicant is happy to engage further with Fingal County Council as these projects progress.

15. Summary of Issue Raised

The Fingal County Council submission notes that *“a more contemporary substation design approach would be welcomed having regard to the visually and environmentally sensitive nature of the lands within the coastal corridor. Design details in relation to proposed compounds and substations, including details relating to noise generation, lighting, entrances, boundary treatment and landscaping should be given careful consideration, particularly in*

locations proximate to residential development and where sited in high quality sensitive landscapes.”

The submission also notes that *“Native hedgerows and trees should be retained as far as practicable, and any replanting should comprise native species.”*

Response to Issue Raised

The Applicant has given careful consideration to the design details in relation to proposed compounds and substations. The Railway Order application includes all of the detail necessary for the Proposed Development within the relevant application drawings, EIAR, NIS and associated documentation. Aspects such as noise generation, lighting, entrances, boundary treatment and landscaping have all been carefully considered and have led us to the design as presented in the Railway Order application. Consultation was undertaken throughout with Fingal County Council, affected landowners and through two rounds of non-statutory public consultation, prior to the design being finalised.

It is intended that native hedgerows and trees will be retained as far as practicable and that any replanting will comprise native species. Landscape proposals, including new hedgerow planting and native tree and shrub planting as appropriate, are provided on the detailed layout drawings (e.g. Drawing D+WP56-ARP-P4-NL-DR-RO-000510 (Specific Locations-05_Donabate), and Drawing D+WP56-ARP-P4-NL-DR-RO-000810 (Specific Locations-08_Skerries)). The requirement for the use of native species is specified as part of the mitigation measures set out in Section 15.6.3 of Chapter 15 of the EIAR.

Chapter 8 Biodiversity of the EIAR sets out the following mitigation measure in Section 8.9.1.3.6 *“Where possible, habitats of importance to breeding birds such as scattered trees and parkland, treeline and hedgerow habitat types, which lie within the footprint, or along the boundary of the Proposed Development, that are not directly impacted will be retained. These areas will be protected for the duration of construction works and fenced off at an appropriate distance. Vegetation to be removed is shown on the Landscaping drawings (Figure 15.3) in Volume 3A of this EIAR.”*

A detailed Construction Environmental Management Plan (CEMP) has been prepared to ensure that potential impacts during construction are minimised. This CEMP, included as Appendix A5.1 to the EIAR, will be further developed by the Contractor in consultation with the relevant local authorities prior to the commencement of construction. Construction mitigation measures in respect of noise, lighting, etc are included in the CEMP.

16. Summary of Issue Raised

The Fingal County Council submission acknowledges the Project specific Flood Risk Assessment (FRA) carried out by the Applicant. However, it notes in this regard, that *“although the FRA has demonstrated that the risks relating to flooding to the scheme are moderate but acceptable and therefore comply with DoEHLG/OPW and Fingal County Council Planning Guidance, the Project SFRA does not consider to what degree crossings are restricting or*

impacting flow and the consequential hydraulic characteristics of the watercourse on receptors elsewhere. Fingal County Council requests a Stage 3 FRA analysing this with mitigation plans to enable unrestricted flow at crossings.”

Fingal County Council also requests that “*the Project design progresses in accordance with Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, from the Department of Housing, Local Government and Heritage.*”

Response to Issue Raised

There are 18 watercourse crossings within the Proposed Development area. Of these, 17 railway crossings utilise existing bridges, and the flows are not restricted by the works to these bridges. However, the Mayne River crossing requires the construction of a secondary bridge adjacent to the existing UBB19, which has the potential to restrict or impact flows.

To assess this, a 1D HEC-RAS hydraulic model was developed using the latest channel survey information. The worst-case design event scenario, resulting in the highest flood level at the bridge section, was identified as the 0.1% AEP fluvial event combined with a 2% AEP tidal event. Hydraulic modelling indicated a localised increase in water level upstream of the bridge by 18 cm. However, this increase was only local and was not observed on the downstream face of the bridge, where the water level remained constant at 4.227 m OD.

The hydraulic regime change was reviewed, and no significant scour or deposition was predicted that would undermine the integrity of the existing or proposed bridge. Additionally, the soffit level of the proposed arch bridge at 7.75 m OD provides a substantial freeboard of 3.24 m, far exceeding the minimum requirement of 300 mm for similar bridges. This indicates that the bridge can handle the specified extreme design event flow without altering the watercourse's hydraulic characteristics or affecting water levels at nearby areas.

The development does not propose mitigation measures other than best practice construction methods, which utilise nature-based solutions, that will ensure the flood risk is managed. No residual risk will remain on site as a result of the works. It was therefore not necessary to complete a Stage 3 FRA.

3.3 SB0108 – Meath County Council (MCC)

The submission received from Meath County Council supports the delivery of the proposed strategic development, noting its potential benefits to the region and the County, playing an integral part of the future vision for the wider development of Co. Meath.

The submission includes comments from various internal departments/divisions within Meath County Council including the Planning and Building Division, Roads & Transportation Division, Parks Division, Architectural Conservation and Heritage Division, Environment and Water Services. The Applicant welcomes this submission and the County Council's support for the Project.

The issues raised in the submission are addressed below:

1. Summary of Issue Raised

The Meath County Council submission notes that *“Despite its many advantages, Co. Meath’s deficit in public transport provision has resulted in persistent outbound commuting, highlighting the need for investment in significant public transport projects such as the DART + projects and investment in smaller scale active travel walking and cycling projects to reverse the modal share and increase sustainable travel. In this regard, the issuing of the Railway Order for DART + Coastal North is welcomed by MCC and will have a positive and major impact on east Meath.*

The DART + Coastal North..... has the potential to significantly enhance the attractiveness and competitiveness of Co. Meath generating further economic growth and employment creation as it transitions to a sustainable and innovative Green Economy. It will enhance the quality of life for the people of Co. Meath and future residents on new residentially zoned land; facilitate the achievement of the transport goals of the County and underpin its strategic location and potential for expansion.”

Response to Issue Raised

The Applicant acknowledges and welcomes Meath County Councils submission in this regard.

2. Summary of Issue Raised

Meath County Council in its submission references how the proposed project aligns with national, regional and local planning policy, but notes further local policy objectives that An Bord Pleanála may wish to consider as well as any relevant updates to the National Planning Framework.

Response to Issue Raised

The Applicant acknowledges the reference to the pertinent policies within the Meath County Development Plan 2021-2027 and the recommendation for their consideration by An Bord Pleanála. The Applicant can confirm that the Railway Order is aligned with these policies and objectives, and as stated within the submission, is supported across national, regional and local policy.

With regards to those policies and objectives specifically targeting works outside of the scope of the DART+ Coastal North Project, such as the provision of a train station at Bettystown, please see our response under point 4 below.

3. Summary of Issue Raised

The Meath County Council submission references a number of relevant planning applications in the vicinity of the application site, within the main submission text and Appendix 5 to the submission. In particular, it notes that *“Meath County Council and Louth County Council have entered into a Section 85 agreement to provide active travel infrastructure along the R-132, between Drogheda Town Centre and South Gate.”* It further notes that *“the existing road cross*

section at the rail overbridge on the R132 adjacent to McBride Station is too narrow to facilitate the vehicular traffic and the active travel scheme” and invites An Bord Pleanála to “consider this issue in its assessment of the RO application.”

Response to Issue Raised

In the first instance, the Applicant has reviewed the Projects included in the submission and Appendix 5 thereof and can confirm that those of relevance have been considered as part of the cumulative effects assessment (which is documented in Chapter 26 of the EIAR). Other applications were identified as either outside of the study timeframe or scoped out of the cumulative effects assessment.

With regard to the proposed active travel project at the Dublin Road Overbridge, please see our response to the further issues raised here, under Point 5 below.

4. Summary of Issue Raised

Meath County Council in its submission notes that *“While the MCDP 2021-2027 has an objective to seek the delivery of a train station at Bettystown as part of the DART expansion works; it is acknowledged that this does not form part of the current proposal. During meetings with the Applicant, MCC advised IE that the location of the proposed substation in Bettystown must not compromise the future achievement of the MCDP objective.”*

“In particular, the layout/ location of the substation should not detrimentally affect an optimal layout for a train station. The Applicant was requested to consider the visual impact of the substation within the site, particularly its location at a likely future permanent entrance to the site and the impact of its positioning along the track as it relates to passenger safety and its effect on passive supervision where people would alight/ access the train track/ train. The careful consideration of access for both construction and future pedestrian/ cycling/ vehicular access was also advised.”

The submission notes the engagement that took place between the Applicant and the local authority in this regard and the changes that were made to the access arrangements to address Meath County Council's concerns. It notes further engagement that took place and further correspondence and details that were furnished to Meath County Council to address concerns and to *“illustrate/ demonstrate that the MCDP objective could be achieved at a later stage.”* The submission notes that the last correspondence in this regard was issued by the Applicant to Meath County Council on the same date on which the RO application was lodged and that *“MCC has not responded to the Applicant on the live application to An Bord Pleanála.”*

In its internal report, the Transportation Department further notes the following: *“The proposed works do not include for the provision of a future train station at Bettystown and the access road to same. It is unclear that the proposed works would not prejudice the delivery of the train station and associated access road at Bettystown, which is an objective in the Meath County Development Plan.”* The Transportation Report goes on to recommend that *“the Applicant should be requested to provide required space for the active travel scheme along the R-132*

that will facilitate safe access to the train station for pedestrians and cyclists from the surrounding residential areas. The Applicant should be requested to demonstrate that the Proposed Development will not prejudice the delivery of the objectives in the Meath County Development Plan in relation to the new Bettystown train station and the access road to same.”

The submission further invites An Bord Pleanála “to consider the comments of the Transportation Department of Meath Co. Council in relation to this proposal; ensuring that future access to the site can be accommodated so the objective of the adopted MCDP can be achieved.”

Response to Issue Raised

Consultation with Meath County Council has been ongoing throughout the design development and with considerable focus on the proposed Bettystown Substation as the design for this substation progressed. Feedback from MCC has helped inform the current design proposals within the RO Application. Below is a summary of the key consultations relevant to the Bettystown Substation development:

- 14.02.2022: Initial meeting with MCC to discuss the option selection process relevant to substations located within the Co. Meath jurisdiction. In this meeting, in relation to the Bettystown substation it was noted by MCC that the development of Bettystown/Laytown station remains a longer-term objective of the Council and should not be compromised by DART+ proposals. This feedback was taken onboard by the Project team in the development of the proposed design.
- 19.07.2022: Meeting with MCC regarding construction compounds and construction access. In this meeting MCC noted their preference to avoid residential areas as construction routes where possible. Construction access to the Bettystown Substation was considered in detail following this meeting and temporary access to the substation site was proposed from the Narrowways Road as part of the Preferred Option.
- 26.04.2023: Pre PC2 briefing to MCC. MCC raised the importance of DART+ Coastal North ensuring that the potential development of Bettystown Station would not be impacted by the Proposed Development. It was stressed by the design team that, while the proposed Bettystown Station would not form part of the DART+ Coastal North Project, its potential future development would not be hindered in any way by the Project development.
- 16.06.2023: Receipt of PC2 Submission from MCC within which it is stated “*In addition, IÉ is also advised to consider the objective which seeks to provide a train station at Bettystown and the new strategic employment site zoning at Laytown. The Proposed Development works should not unduly affect access to lands zoned in the Meath County Development Plan 2021-2027. The Proposed Development should not negatively affect the delivery of a rail station in Bettystown.*”
- 14.11.2023: Post PC2 update to MCC. A meeting was held to provide MCC with an overview of updates to DART+ Coastal North following completion of PC2. MCC informed the Project team that it was not in favour of the proposed temporary access road for construction to the east of the proposed Bettystown substation (preferred option at the time), nor was it in favour of the proposed (at the time) permanent access

via Ardmore Avenue. The design team agreed to take the feedback away and consider the Preferred Option further.

- 30.01.2024: Meeting with MCC to provide updates on revisions to the Bettystown Substation proposals. The meeting provided a revised design with access being provided to the Substation and compound from the Northwest corner of the site as per the image below:

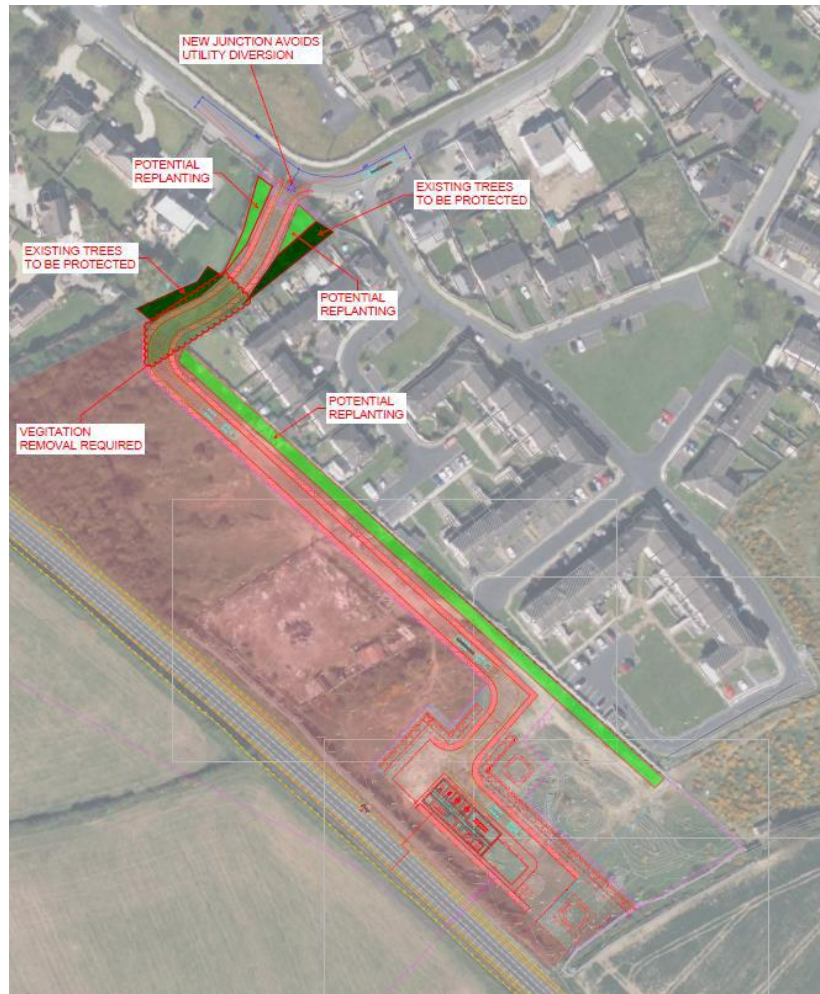


Figure 8 Sketch showing access arrangements (revised during design development) for proposed Bettystown Substation

Feedback from MCC was received particularly in relation to protecting the MCC zoning objective for a future station at Bettystown. It was agreed that sketches would be provided to demonstrate that a future station would not be prohibited by the DART+ Coastal North proposals. The proposed access arrangement remained an issue of concern to MCC in this regard.

- 28.05.2024: Further to email correspondences a meeting was held to discuss the design and demonstrate how a future station could be accommodated within the design proposals if a need to develop a station in future arises. Sketches were tabled

solely with the purpose of demonstrating that the proposed DART+ Coastal North Project will not prohibit the development of a future station at Bettystown. This was discussed at length at the meeting.

- 12.07.2024: Email correspondence providing revised access arrangement layouts relevant to access from the south of the Bettystown Substation which was developed as a result of the feedback received during previous meetings with MCC. While the Applicant recognises that the further information was furnished at the same time as the RO application submission, effort was made a number of times to seek further feedback from MCC thereafter. However, the Council informed the Applicant that, given the RO statutory consultation process had begun, it was not in a position to respond.

Provision of a new railway station at Bettystown is not within the current scope of the DART+ Coastal North Project. However, we fully acknowledge the Meath County Development Plan (MCDP) objective to deliver a station at this location in the future. Through extensive consultation with Meath County Council (MCC), we have ensured that the proposed works, including the substation, do not impede the realisation of this objective. This has been demonstrated through the sketches and technical details shared with MCC, which show that the MCDP objective can be achieved at a later stage.

The substation has been carefully located to minimise its visual impact and ensure it does not affect any future railway station layout, taking account of the likely optimal layout for that station. Its design and positioning also considers future passenger safety and supervision requirements, ensuring that its location will not interfere with safe and effective passenger access to a potential station.

Following feedback from MCC, modifications were made to the proposed access arrangements to mitigate impacts on the adjacent residential development (the Council was not in favour of permanent access being provided through a residential development). A new, dedicated substation access road was therefore identified, to provide access during construction and for future operations. The Applicant notes that the substation will largely be unmanned, such that traffic during the operational phase will be low. It is not intended for public use and will feature security gates to ensure segregation.

The Applicant appreciates that Meath County Council wishes to ensure future provision for an active travel scheme along the R132 and to any future station. The Applicant has engaged with MCC at length to demonstrate that future pedestrian, cycling, and vehicular access to the site can be provided with the DART+ Coastal North Project in place. If the station is progressed in the future, the current substation access could be reconfigured as a T-junction off the new station access road, with the substation access from the east closed once the new road is constructed, ensuring compatibility with active travel objectives.

This approach demonstrates a clear commitment by the Applicant to safeguarding future development at the site while addressing the immediate needs of the Project.

5. Summary of Issue Raised

In respect of the R132 and the proposed works to the underbridge UBK01 (R132/Dublin Road Bridge) at Drogheda, as detailed above, the submission notes that *“Meath County Council and Louth County Council have entered into a Section 85 agreement to provide active travel infrastructure along the R-132, between Drogheda Town Centre and South Gate”*. It further notes that *“the existing road cross section at the rail overbridge on the R132 adjacent to McBride Station is too narrow to facilitate the vehicular traffic and the active travel scheme”* and invites An Bord Pleanála to *“consider this issue in its assessment of the RO application.”*

The Transportation Report appended to the submission recommends that *“the Applicant should be requested to provide required space for the active travel scheme along the R-132 that will facilitate safe access to the train station for pedestrians and cyclists from the surrounding residential areas.”*

Response to Issue Raised

The Proposed Development includes modifications to the Dublin Road Underbridge (UBK01) adjacent to Drogheda MacBride station. These modifications include widening of the bridge (ie widening the rail line above the road) to accommodate the introduction of a new platform and the slewing of the tracks to the south. The R132 road runs beneath this bridge. The Applicant is aware, through consultation with both Meath and Louth County Councils, that there is an active travel scheme being planned for the R132.

Consultation between the DART+ Coastal North Project team and Louth Co Council has been ongoing through the design development including 11 meetings taking place in addition to pre-public consultation briefings and ongoing email correspondences. Some of the key consultations relevant to the Dublin Road Bridge are provided below:

On 06.09.2022: A meeting was held between the DART+ Coastal North Project team and representatives from Louth and Meath Co Councils to discuss the proposals relevant to the Dublin Road Bridge. The aspirations of both LCC and MCC to develop active travel measures along the Dublin Road were raised. At the time of the meeting no proposals had been finalised by LCC. A need to continue engagement with LCC, MCC and NTA was agreed with regards to future active travel aspirations.

On 2023.05.05: A pre-PC2 meeting was held between the DART+ Coastal North Project team and representatives of LCC and MCC. Concerns that no allowance had been made within the DART+ Coastal North proposals for active travel under the Dublin Road Bridge were raised. MCC noted that a risk of objection at RO / Oral hearing may arise should provision for active travel not be made. The objectives of DART+ Coastal North were clarified and it was noted that any provision for active travel measures would need to be carried out as part of future projects should an active travel project be progressed by LCC/NTA in future.

Reference was made by LCC to ongoing discussions between LCC & NTA regarding active travel along the Dublin Road. It was agreed to keep the DART+ project team up to date with developments. The DART+ Coastal North team agreed that the Project would await any

guidance from NTA and react accordingly should a need be established to widen between the Dublin Road Bridge abutments to accommodate active travel.

On 2023.06.19: A follow up meeting was held to the meeting of 05.05.2023. LCC informed the DART+ Coastal North team that proposals for active travel measures were being progressed by LCC and that the NTA was to commission an independent feasibility assessment of providing such measures. The DART+ Coastal North team stated the significance of such measures being progressed but that the position of the Project remained that no widening of the road was currently required for its project. The need to continue engagement between the DART+ Coastal North Project, LCC & NTA was agreed.

On 2023.11.10: A post PC2 meeting was held with LCC. In this meeting LCC presented initial feasibility options being considered for the active travel project.

However, to the Applicants knowledge, and from consultations with both Meath and Louth County Councils and the NTA, at the time of submission, the active travel scheme has not been progressed to a stage where sufficient information is available to be able to assess the scheme or accommodate any designs within the DART+ Coastal North Project.

6. Summary of Issue Raised

In its submission, Meath County Council references several “*Protected Views and Prospects*” and invites An Bord Pleanála “*to consider these, in particular No. 65 and No. 75.*”

Response to Issue Raised

Protected Views and Prospects, including No. 65 and No. 75 are highlighted under Zone D in Table 15-5 (Baseline) in Chapter 15 Landscape and Visual Effects in the EIAR. Section 15.5.1.2.7 Preserved Views / Scenic Views notes that: “*The preserved view from Laytown Strand (Meath Ref. No. 65) looking northwards along shore will not be affected. The works will be present along the railway to the west but will not be visible in northward views. The sensitivity is high and the magnitude of change is negligible. The landscape / townscape and visual effect of the Construction Phase on these preserved views will be Imperceptible, Neutral, Temporary / Short-term. Other protected views in Meath, including Nos. 68, 69, 70 and 71, are distant and will not be perceivably affected by the proposals.*” This assessment is also presented under Preserved Views / Scenic Views in Tables 15-6 to 15-9.

7. Summary of Issue Raised

The submission notes a number of the key infrastructural details of the application and raises the following issues in this regard:

- a) View from South Co. Meath towards Bremore – the submission notes that in respect of the access to the substation from the R132, “*it is not considered that any visual impact will arise in Co. Meath because of this proposal*”
- b) Gormanston Viaduct - the submission by Meath County Council notes that “*the electrification works at Gormanston Viaduct will present a change to the localised change to the landscape.*” The Meath County Council Conservation Officer notes that

- “this is a Protected Structure (91050 - Knocknagin Viaduct) constructed in 1844 and notes that there do not appear to be any proposals to modify the parapet or viaduct.”*
- c) Gormanston Substation – The submission advises ABP *“that the Army Camp runway is located between Chainage 18.18 and 18.19 and may wish to consider any related comments by the Dept. of Defence, DAA, IAA, etc. regarding the OHLE or other works within the application site, etc”*
 - d) Gormanston Army Camp and Ben Head Access Road – the submission notes that *“A substation and construction compound are proposed on third party lands along the access road to Ben Head, immediately south of the access road and an existing farmhouse and farmyard/ agricultural enterprise. It is also noted that it is proposed to demolish an existing structure, but no further details are provided. ABP are referred to the comments of MCC’s Archaeologist who noted the lack of a building assessment and mitigation. It is recorded on the 1939 Cassini map. There is a WWII / Emergency Pillbox attached to the Irishtown Bridge ITM 717346, 768200 OBB68 / BH-123 - This Pillbox is not mentioned in the text and fixings are proposed to this bridge parapet. The WWII / Emergency Pillboxes in/ around the Boyne Valley are a Heritage feature, and many are Protected Structures. This Pillbox and other Pillboxes/ Vernacular Architecture should form part of the Architectural Assessment with mitigation proposed where relevant.”* It also notes that *“An existing hedge runs along the southern boundary of the compound which although reasonably mature, has been cut low and could assist with assimilation of this type of development at this location and it is positioned close to existing buildings/ vegetation.”*
 - e) St. Columcille’s Playing Pitches to Laytown Viaduct – construction compounds – the submission notes that *“MCC’s Environment (Flooding and Surface Water) Department) has stated that from a flooding perspective, there are no issues, and the proposal is acceptable. ABP may wish to consider if measures are required to prevent soil erosion at this location.”*
 - f) Laytown Viaduct to Laytown Train Station – bridge and viaduct modifications – in respect of OHLE fixing to Laytown Viaduct, the submission notes that *“the Conservation Officer has advised that in order to make an informed assessment as to the effect on the existing Laytown 18 Viaduct Structure, detailed drawings illustrating the proposed method of attaching the new poles to the existing structure is required (with reference to 02-Volume 3B Photomontages - Figure: 15.3.45.2); and notes that plans do not indicate any proposed parapet or viaduct modification works to Gormanston / Knocknagin Viaduct.”* The submission also notes that *“the access road immediately south of the Viaduct is very narrow and hazardous for 2 cars to pass each other. This will have a knock-on effect on construction vehicle access; and a safe road management system will need to be put in place. This area is used by pedestrian and local amenity users accessing Laytown Pitch and Putt Club, Laytown United SFC, St. Colmcille’s GAA Club.”*
 - g) Bettystown Substation – the submission notes the concerns of Meath County Council as per Point 4 above (see response under Point 4 above)
 - h) Construction Compounds to the south of Colpe Road and Park Wood Housing Estate – in this regard, the submission notes that:

- It is generally considered that the proposed siting of the compound east/adjacent to the Colpe Rd. is acceptable, given the siting adjacent to the road bank, which is considerable higher than the agricultural field levels. This is subject to the implementation of suitable screening which will mature overtime.
- It notes in respect of the upper compound which accesses the track via an area of existing public open space (which forms part of an A1-Existing Residential area (Park Wood Housing Estate), that *“it is recommended that the impact of construction activities at this location on existing residences must be mitigated, with on-site Communications Officer and Complaints Register. ABP may wish to consider an appropriate condition regarding planning gain (e.g. social infrastructure) for the benefit of this residential scheme.”*
- Finally, in respect of this area, it notes that *“the existing residences which will be affected by the construction compound proposal are located at Park Wood and the adjoining public open space. This is positioned mid-way into the estate. No photomontage has been provided at this location 20 and ABP may wish to consider whether this should be requested. This would appear to require the removal of existing mature trees to provide of the construction compound”*
- Construction Compounds in Co. Meath – the submission notes that there are 16 compounds proposed in Co. Meath and notes in particular the following:
 - ABP are invited to consider the impacts from the construction phase on residential areas or other noise sensitive locations, including demolition, vibration, noise, night-time works, traffic delays, road network, etc’.
 - *“It is recommended that consideration is given to conditions related to the operational phase to again limit the impact on residential areas, particularly noise and vibration.”*
 - The submission references that *“the Applicant has employed, for example, a Construction Noise Assessment with reference to BS 5228, etc. Chapter 14 Noise and Vibration discusses Zone D includes references to Skerries and Balbriggan (which are not located in Co. Meath) and likely contains an error (Section 14.5.1.1.5). ABP may wish to consider if sufficient information in relation to Zone D has been included.”*

Response to Issue Raised

In respect of the various infrastructural proposals referenced above, the Applicant has provided a response to each of these in turn below:

- a) View of South Meath towards Bremore - Meath County Council’s conclusion that there will be no visual impact from the proposal is noted and welcomed by the Applicant.
- b) Gormanston Viaduct – the proposed design does not require any modifications to Gormanston Viaduct. The bridge length is short enough to allow the OHLE masts to be placed in the embankment either side of the bridge, with the OHLE wires spanning the full length of the viaduct without the need to attach support structure to the bridge.

- c) Gormanston Substation – The Applicant notes that it has engaged extensively with the Department of Defence in respect of its proposals for the substation and has ensured that it has taken full cognisance of any Department of Defence requirements.
- Meetings with Department of Defence representatives took place on 2022-03-15 and 2023-08-01 to discuss the Project proposals and potential impacts on the Gormanston Camp. These meetings were supplemented by numerous email correspondences required to provide all necessary clarifications to the Department of Defence through the design development.
- d) Gormanston Army Camp and Ben Head Access Road – The Applicant notes the presence of an existing pillbox but notes that the pillbox is located approximately 9m back from the end of the existing bridge (OBB068) and the proposed parapet modifications. The pillbox is not expected to be impacted by the proposed DART+ Coastal North works.
- The structure noted in the FCC submission is located in lands owned by the Irish Army and access was not granted, therefore views were taken from the road. See image below.



Figure 9 – Image showing structure within Department of Defence Lands to be demolished

The structure is late in date and of block construction. The structure has no roof and does not appear to have been constructed to be roofed. The Applicant's specialists' initial thoughts are that it was an area for storage, or an unfinished abutment associated with the railway and not of an archaeological heritage interest. It is heavily overgrown and currently used by the Irish Army as part of their training routines.

In terms of mitigation, once access is granted to the lands, can the vegetation be stripped back and the structure assessed? If it is of architectural heritage interest, can it be surveyed with a full and detailed written and drawing record to be carried out in advance of development.

From a biodiversity perspective, a bat survey was carried out and some records for Common and Soprano Pipistrelle as well as Leisler's were returned. The size of the Pill box being of heavily fortified but open concrete construction is not considered suitable as a bat roost. Indeed, adjacent linear mature trees along Irishtown Road are considered to afford better roosting potential.

In respect of the existing hedgerow, the Applicant will maintain this hedgerow where possible, whilst ensuring that required sightlines (for road safety) are achieved.

- e) St. Columcille's Playing Pitches to Laytown Viaduct – The Applicant notes Meath County Council's assessment that there are no issues from a flooding perspective associated with the proposed construction compounds. In respect of the point noted regarding the potential for soil erosion, the Applicant references the comprehensive assessment of the potential effects of the Proposed Development on Land and Soils in Chapter 9 Land and Soils of the EIAR. This includes a suite of mitigation measures to ensure that any potential effects are minimised during the construction phase. A detailed Construction Environmental Management Plan (CEMP) has also been prepared and is included in Appendix A5-1 of the EIAR. The Applicant is confident that these measures will ensure that there is no significant effect from soil erosion associated with the Proposed Development.

- f) Laytown Viaduct to Laytown Train Station – The Applicant notes the reference to Gormanston viaduct and refers to the response under Item (b) above. In respect of Laytown Viaduct, the OHLE support structure and its connection to the existing bridge is detailed in the drawings presented in Book 3 Specific Locations of the RO application (Reference Drg No. D+WP56-ARP-P4-NL-DR-RO-001100). Access along Coastview Cottages is necessary to deliver the works on the southern pier. While the duration of construction is dependent on the final track possession details, it is likely to be c. 3 months. The need for traffic management during construction is fully acknowledged and a detailed Construction Traffic Management Plan (CTMP) has been prepared and included within the Construction Environmental Management Plan (CEMP) in Appendix A5-1 of the EIAR. This CTMP will be further developed by the Contractor in consultation with the relevant authorities, including Meath County Council, prior to construction.

- g) Bettystown Substation – a response to this issue is provided under Response No. 4 above.
- h) In respect of the points noted regarding the construction compounds to the South of Colpe Road and Park Wood Housing Estate, responses are as follows:
- The Applicant notes that Meath County Council considers the siting of the compound east/adjacent to Colpe Road acceptable and welcomes this view. The Applicant also notes the temporary nature of this (and all construction compounds).
 - In respect of the upper compound which accesses the track via an area of existing public open space within a residential estate, the Applicant notes the recommendations of Meath County Council in this regard. The Applicant is committed to ensuring that the impact of construction activities is minimised to the extent possible. A detailed Construction Environmental Management Plan (CEMP) has been prepared and will be further developed and implemented by the Contractor during the construction phase in consultation with the relevant local authorities, including Meath County Council. The CEMP, which is included as Appendix A5.1, in Volume 4 of the EIAR, sets out (Section 3.9) a Complaints Procedure which will be implemented for the duration of construction. This includes the following: *“A liaison officer will be available to allow for member of the public or interested parties to make complaints about the construction works. The CEMP will contain details of the complaints procedures, and a monitoring system will be implemented to ensure that any complaints are addressed, and satisfactory outcome is achieved for all parties.”* Again, while subject to the final track possession details, the duration of works in this location is likely to be c. 1 month.
 - The Applicant notes Meath County Council's comments in respect of planning gain.
 - Finally, in respect of the lack of photomontages in this area and the impact on existing vegetation, the Applicant notes in the first instance that there is no proposal to remove mature trees in this area. The temporary construction compound is required to construct an undertrack crossing. For that reason, no photomontage was considered necessary, given the temporary nature of the compound and the fact that the permanent works will not be visible.
- i) In respect of the construction compounds, the Applicant responds to the points raised as follows:
- The Applicant notes the submission of Meath County Council in this regard. Detailed environmental assessments of the DART+ Coastal North Project have been carried out to identify the construction phase impacts of the Proposed Development. In particular with respect to residential areas, Chapter 6, Traffic & Transportation, Chapter 7 Population, Chapter 12 Air Quality, Chapter 14 Noise and Vibration and Chapter 23 Human Health address impacts on sensitive receptors such as residential areas from the construction of the proposed scheme. A detailed CEMP has also been prepared (Appendix A5.1) as referenced above, which includes specific measures to minimise impacts during the construction

phase. This CEMP will be further developed by the Contractor in consultation with the relevant authorities, including Meath County Council prior to construction.

- It is worth noting the assessment of impacts in Zone D (Meath County Council administrative area) in Chapter 7 Population of the EIAR, as set out in Section 7.5.3.5. The Applicant also notes the residual effects during the construction phase identified in Chapter 7 Population and in particular, the following in Section 7.7.1: *“While all residual construction effects are negative, they are also temporary. Those works associated with parapet modifications or track lowering will be of low magnitude and short duration. More significant works associated with OHLE piling and substation construction will also occur over short periods at any one location. By comparison, bridge modifications and station modifications will occur within periods of months to years. The extended works, with more significant residual effects for local residential areas, are likely at Howth Junction and Donaghmede, Clongriffin, Malahide and Drogheda”*. Further, Chapter 23 Human Health concludes in respect of the construction phase effects, the following (Section 23.9.1): *“With the implementation of the mitigation measures proposed in Chapter 27 (Summary of Mitigation and Monitoring Measures) of this EIAR, no significant residual human health effects are predicted during the Construction Phase.”*
- In respect of operational phase impacts on residential areas, again, the Applicant notes that a comprehensive assessment has been undertaken to identify the potential for effects on receptors, from the DART+ Coastal North Project, including the potential for effects on residential areas. The Applicant references the chapters in the EIAR which particularly focus on this, as referenced in our response to the point above. In particular, the Applicant would draw attention to the residual effects concluded in Chapter 23 Human Health of the EIAR in respect of the operational phase, as set out in Section 23.9.2 as follows: *“As outlined previously the impacts on human health during the Operational Phase are positive. It brings a modern and sustainable means a public transport to Dublin City, Fingal and Counties Meath and Louth, which will be used by the residents and visitors. It will be used as a means to travel to and from work, school, college and recreational activities. It also enhances access to services including health services. No significant residual human health adverse effects are predicted during the Operational Phase. Through a combination of benefits including socio-economic benefits, access to services, access to exercise and potential psychological benefits, an overall positive impact on human health is predicted”* and the following within Chapter 7 Population (Section 7.5.4), which states *“During the Operational Phase, the electrification of the line will provide the infrastructure to permit increased capacity and frequency of services over time. There will be more frequent services on the line between Dublin and Drogheda and also an improvement in journey time reliability, providing for a significant positive effect in terms of journey characteristics and journey amenity for passengers. Overall, the Project would provide people in towns and settlements along the line with more choice in relation to journeys to Dublin or Drogheda, and stations in between. A positive effect would apply in terms of social inclusion too in that people without access to a car will have improved accessibility*

to employment and education opportunities in Dublin and elsewhere. Similarly, there are potential wider economic benefits in that employers in Dublin and other centres connected by DART+ Coastal North will have access to a larger employee catchment with productivity benefits for the economy. There are potential external social and economic benefits if the improved capacity and services encourage a transfer from private vehicles and more trips by public transport.” This section does go on to state the following with respect to Noise and Vibration (which is of particular relevance for residential areas in proximity to the rail line): “The increased frequency of services enabled by the Proposed Development has the potential to affect noise and vibration. More frequent services mean more instances of elevated noise with potential effects on residential amenity. However, the noise effects will also be moderated by the electrification itself and use of EMUs when compared with to the use of existing diesel locomotives running at the same speed. Minor adverse impacts on a large number of residential properties, along with a small number of non-residential receptors, are identified in Chapter 14 (Noise and Vibration), with the largest number of properties listed within Zone C. However, these effects are assessed as being not significant following mitigation. Some significant effects due to proposed housing developments are assessed in Chapter 26 (Cumulative Effects) in Volume 2 of this EIAR.”

- In respect of the Construction Noise Assessment, the references to new fencing works at Skerries and Balbriggan in section 14.5.1.1.5 Zone D of the EIAR occur within Zone C. Sufficient construction noise assessment results in relation to Zone D have been included in section 14.5.1.1.5.

8. Summary of Issue Raised

Meath County Council notes the proposed Ecological Clerk of Works within the construction phase but recommends that ABP consider whether there is a need “*for this to be extended into the operational phase with monitoring of the implementation of mitigation, as part of the conditions of the RO.*”

Response to Issue Raised

The Applicant notes this recommendation from Meath County Council. The Applicant would have no objection to a condition being attached to a grant of a Railway Order for the implementation of mitigation measures during implementation of the railway works.

9. Summary of Issue Raised

Meath County Council notes in respect of Hydrogeology that “*as there is likely to be contaminated land along/ under the rail line, IE may need to implement measures to remediate same, given the potential impact of leachate on subsurface aquifers, surface water bodies and coastal water bodies. There is reference to the excavation of contaminated land and its disposal.*”

Response to Issue Raised

The Applicant notes this comment. A comprehensive assessment of the potential for contaminated land and the potential for impacts of same on aquifers, surface water and coastal water bodies within the development boundary and wider study area was carried out in Chapter 9 Land and Soils, Chapter 10 Water and Chapter 11 Hydrogeology of the EIAR.

Chapter 9 Land and Soils included a screening of the soil quality results from the Project-specific ground investigation against appropriate environmental criteria (as detailed in Section 9.4.10 of the EIAR and the classification of the soils as wastes for disposal in accordance with the methodology set out therein. A detailed assessment of the potential impacts of excavation of potentially contaminated ground is provided in Section 9.7.2 of the EIAR, with appropriate mitigation measures set out in Section 9.8. The residual effect in respect of contaminated soils, following implementation of these mitigation measures, is deemed to be imperceptible.

Chapter 10 Water of the EIAR addresses the potential effect of the Proposed Development on surface waters and considers the potential for contaminated runoff to surface waters. A suite of mitigation measures is proposed, as detailed in Section 10.89 of the EIAR, which includes the implementation of the Construction Surface Water Management Plan (SWMP) which has been prepared and is included as sub-Appendix H of the Construction Environmental Management Plan (CEMP) in Appendix A5-1 in Volume 4 of the EIAR. This SWMP will be developed further by the Contractor prior to construction in consultation with the relevant local authorities. Monitoring of water quality will also be undertaken during the construction phase of the Proposed Development, as detailed in Section 10.9.3 of the EIAR. With the implementation of these measures, the residual effect is predicted as imperceptible.

With particular reference to the hydrogeological risk from contaminated land, Chapter 11 Hydrogeology of the EIAR includes a comprehensive assessment of the potential impacts of the Proposed Development on hydrogeology. Risks to aquifers, surface water and ecology were assessed from accidental spills and existing contamination. Some potentially significant impacts were highlighted, but appropriate mitigation is provided, and no significant residual impacts are predicted (see Section 11.8 and 11.9 of Chapter 11 of the EIAR), where the residual impact is deemed to be imperceptible during the construction phase.

The Applicant also notes that a Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This CEMP includes a suite of measures to be implemented during the construction phase, including those relating to soils, surface and groundwaters. The CEMP will be further developed by the Contractor, prior to construction in consultation with the relevant local authorities, including Meath County Council.

The demonstrates that all necessary measures to ensure that any contaminated soils encountered during the construction phase are dealt with appropriately in line with the measures set out in the EIAR, such that the residual impact on the surrounding environment, including aquifers, surface waters and coastal waters, will be imperceptible. The Applicant is of the view that no additional measures, over and above those in the EIAR, are required for the Proposed Development.

10. Summary of Issue Raised

In respect of the Landscape and Visual Amenity assessment, Meath County Council notes that *“the site is not located within the Bra na Boinne World Heritage Site (WHS) or buffer zone, nevertheless ABP are invited to consider whether the proposal could affect the WHS. The locations identified by Meath Co. Council during pre-planning for the purposes of visual impact assessment have generally been considered by the Applicant. The visual impact of the Proposed Development increases because of the infrastructure in several locations due to the OHEL, etc., therefore the implementation of appropriate mitigation measures is required, particularly vegetative screening.”*

Response to Issue Raised

At between 6 to 12km from the core area (and 5 to 11km from the buffer area), the section of railway (Drogheda to River Nanny crossing at Laytown) nearest and east of Brú na Bóinne World Heritage Site is at significant distance. In addition, the railway is ground based infrastructure, and generally well-integrated and screened within the landscape – even when viewed at relatively close distances.

Notwithstanding these factors, the nearest section of railway to Brú na Bóinne is located to the east of existing urban / suburban development at Drogheda and is entirely screened from the World Heritage Site. From Brú na Bóinne the railway south of Drogheda is viewed against existing development at Bettystown leading to Laytown. As such, even if the railway and Proposed Development was visible, it would be viewed against existing development.

The Project will have no visual impact on views from Brú na Bóinne.

11. Summary of Issue Raised

In respect of Material Assets – Agricultural Properties, Meath County Council notes that *“a landowner liaison officer is required to remedy issues relating to access as a result of this development proposal; or any works which would affect the economic viability of businesses along the route”*.

Response to Issue Raised

In this regard, the Applicant would point to the following mitigation measures included in the EIAR:

- Chapter 16 Material Assets – Agricultural Properties, and in particular, Section 16.6.1 which states that:
 - *“A landowner liaison officer (LLO) will be identified by the contractor during the Construction Phase to facilitate communications between affected landowners and to facilitate the management of farm enterprises with landowners during critical times*

- *Prior to works commencing each affected landowner will be met by a member of the Project team to inform them of the expected start date on their lands, duration of works and to agree on specific issues in relation to access, presence of livestock, etc. which pertain to the Proposed Development*
- *Following completion of relevant construction work, lands temporarily acquired will be reinstated to the existing agricultural condition. All materials and waste will be removed and disposed of appropriately*
- Chapter 17 Material Assets – Non-Agricultural Properties, and in particular, Section 17.7.1.2 which states that:
 - *“Access will be maintained to all affected properties as far as reasonably practicable and if interruption is necessary, it will be pre-notified to the property owner / occupant and it will be restored without unreasonable delay. Traffic management measures will be put in place during the Construction Phase where temporary or minor diversions are required. These measures are detailed within Chapter 6 (Traffic and Transportation) in Volume 2 of this EIAR.”*

12. Summary of Issue Raised

In respect of Material Assets – Utilities, the Meath County Council submission notes that *“the substation connection cable associated with the NISA project is proposed to tunnel under the existing rail line at Bremore (to the south of Co. Meath), which is the subject of a current Strategic Infrastructure Development Application.”*

Response to Issue Raised

The Applicant is aware of this adjacent Proposed Development and has engaged with the developers of the NISA project from an early stage in a collaborative manner to ensure that there are no conflicts with the infrastructure proposed as part of this offshore wind farm. This engagement will continue through ongoing design development and construction, should both projects be consented. The potential for cumulative effects with this Proposed Development have been considered throughout and an assessment of cumulative effects is documented in Chapter 26 Cumulative Effects of the EIAR with the cumulative impact noted as follows: *“At the time of writing, North Irish Sea Array Offshore Wind Farm (NISA) was at the pre-application stage, with the team working to develop the Project with the view to submitting a planning application in 2024. Surveys have been carried out along with consultation and technical appraisals, which will be considered and might influence how the Project develops. NISA would have the capacity to produce renewable energy for Ireland’s electricity grid, together with improvements to public services and communities.*

While much of the infrastructure for NISA will be located offshore, there will be onshore infrastructure, including substations and an onshore cable to connect the power generated by the offshore turbines, to the national grid. It is likely, given the location of the Project, that the onshore infrastructure may be in the vicinity of the DART+ Coastal North Project and the

onshore cables may cross the railway line between Dublin and Drogheda. The NISA project will be subject to an EIA and NIS similar to DART+ Coastal North. Appropriate mitigation measures will be included in the NISA EIAR and Appropriate Assessment documentation to minimise potential impacts to the environment.

During the Construction Phase the mitigation measures within Appendix A5.1 (CEMP) for DART+ Coastal North will be implemented by the contractor to minimise effects. These measures will ensure that there are no significant cumulative effects with the NISA project. The CEMP contains a Construction Traffic Management Plan (CTMP) which includes a measure for interface with other projects. This specifies that liaison will take place on a case-by-case basis, as will be set out in the Construction Contract, to ensure that there is coordination between projects, that construction access locations remain unobstructed by the Proposed Development works, that temporary traffic management measures are implemented in a planned and coordinated manner and that any additional construction traffic mitigation measures required to deal with cumulative impacts are managed appropriately. Significant negative cumulative effects are therefore not predicted between the proposed DART+ Coastal North Project and the NISA project. The proposed DART+ Coastal North Project will reduce carbon emissions and similarly, an offshore wind project will achieve low carbon emissions, which will assist in meeting Ireland's commitments to decarbonisation."

13. Summary of Issue Raised

In respect of Archaeology and Cultural Heritage, the Meath County Council submission includes the following: *"MCC's Archaeologist has provided a series of recommendations and ABP are requested to consider same. They include the consideration of Meath's Industrial Heritage Record, standard approaches to archaeology and in particular the proposed demolition of a structure (Figure 15.3.41.1 in EIAR Archaeology, Cultural Heritage and Architecture Chapter) in the absence of any building assessment or mitigation."*

The submission also requests the following further information is provided:

- a) *"The Applicant shall confirm whether the Meath Industrial Heritage Survey was consulted; and used to inform the Proposed Development."*
- b) The size (square metre areas) of each Areas of Archaeological Potential (AAPs) and a break down into areas with *"potential"* and *"areas already disturbed"* should be provided to determine the overall impact potential of the scheme in the most sensitive areas can be assessed spatially.
- c) Please clarify whether the Project will be subject to Section 26 Licences or Ministerial Directions.
- d) The Applicant shall clarify why the AAPs selected for advance testing were chosen, over other areas. This should take place in as many of the AAPs as possible, to reduce construction phase monitoring and reduce risk of delays and disruption.
- e) Please state the quantity of advance testing. 12% or 600 linear metres x 2m wide per hectare is typically required. The Applicant states that all construction works will be archaeologically monitored, however the aim of advance testing is to complete enough

of a survey in any AAPs so that construction works in those areas are not monitored – with the agreement of the National Monuments Service.

- f) The details on Mitigation Rescue Excavation and/ or preservation in situ discusses testing or monitoring, however this should present Rescue Excavation and/ or preservation in situ as this does not address mitigation and to clarify the proposed approach. Best practice is to rescue excavate anything within the red line boundary unless it is of such significance that it deserves to be preserved in situ. The Applicant must carry out additional assessment and a strategy/management plan agreed with the National Monuments Service.
- g) The Applicant should clarify the area (square metre) and locations for residual monitoring, reviewing same so they can be mitigated prior to commencement of construction, to avoid/ limit construction phase monitoring as possible. This will avoid archaeological sites being missed, recorded under development pressure, delays, etc.
- h) The Applicant is requested to clarify whether “*North Skerries substation walling BH88 (20m)*” is associated with Thomas Hand and family. If it is closely connected, sensitive community engagement may be required.
- i) In the interests of clarity, the Applicant should prepare a table which lists each heritage asset, basic description, impact (actual change not magnitude) and proposed mitigation measures.
- j) The Applicant is requested to clarify personnel (e.g. Project Archaeologist, etc.) who will be responsible for Architectural Mitigations.

Response to Issue Raised

The comments of Meath County Council are noted. The Applicant would note the detailed archaeology and cultural heritage assessment which has been undertaken, as documented in Chapter 20 Archaeology and Cultural Heritage of the EIAR. please find below a detailed response to the queries raised:

- a) The Meath Industrial Heritage Survey 2010 was consulted as part of this Project. Archaeology and Cultural Heritage was considered in Chapter 20 and Architectural Heritage in Chapter 21.

Upstanding industrial heritage sites mentioned within Meath’s Industrial Heritage Survey that contribute to the present-day character and uniqueness of an area by reflecting its historic past, were assessed within Chapter 21 (Architectural Heritage) as this chapter assessed train infrastructure, signal buildings, stations, road and pedestrian structures, mills and buildings. In terms of extractive industries such as quarrying, sandpits and gravel pits or processing materials such as lime kilns, information in relation to these activities is contained in Chapter 20 (Archaeology and Cultural Heritage). A number of national surveys contain information on County Meath industrial sites and features. The Record of Monuments and Places (RMP) of the Archaeological Survey of Ireland, the Record of Protected Structures (RPS) within Meath County Council Development Plan (2021-2027) along with the Archaeological Inventory of County Meath and historic mapping were all consulted for the purpose of providing industrial heritage information for this Project.

In response to items b), c) and d) above, please find further detail as required in Appendix A herein, together with the narrative below.

- b) In Co. Meath four locations at Gormanston, Irishtown, Colp East and Newtown were selected for advance testing. These areas were chosen as they were considered to be of archaeological potential, given the results of the desk-based assessment, field work and geophysical survey and invasive works will be taking place where there is the potential to disturb below ground remains.

Work will take place under Section 26. The DART+ Coastal North Project is not an “*approved development*”. As such, Section 26 of the National Monuments Act 1930 (as amended) applies and this requires that the Archaeological Test Excavation Services be carried out under licence/consent(s) from the Minister for Housing, Local Government and Heritage. Officers, servants or agents of the Minister may inspect the archaeological works at any time and full co-operation shall be given to them in carrying out the inspections. All requests from the Director of the National Museum of Ireland for members of his/her staff to visit the works shall be facilitated. The foregoing is without prejudice to any powers of the Minister or the Director and their officers, agents, servants or licences arising under the National Monuments Acts 1930 to 2014 or howsoever otherwise arising.

- c) While there are no recorded monuments within those areas proposed for advance testing, and field inspection or an analysis of historic maps and aerial photography did not reveal any newly identified sites, these areas were put forward for assessment as they were considered to be of an archaeological potential given their greenfield nature, previously undisturbed soils and/ or proximity to designated monuments (Section 20.6.2.1, EIAR Volume 2: Chapter 20 Archaeology & Cultural Heritage).

Testing will also take place to verify the results of the geophysical survey. The purpose of testing is to determine the location, date, nature and extent of any previously unknown archaeological site. The test trench layouts target the green field potential of the lands.

- d) Please view Table A-2 in Appendix A for the quantity of strategic test trenching proposed. All archaeological investigation whether it is archaeological testing or monitoring will be agreed with the National Monuments Service and will be carried out under licence to the National Monuments Service and the National Museum of Ireland. For Areas 8-12, a series of mapping has been created that show a possible layout of trenches, taking into account areas of vegetation and overhead wires.
- e) All mitigation measures as set out in section 20.6 will be adhered to. Section 20.6.2.1 states that “*It is proposed that any archaeological features revealed by the test trenching, which will be directly impacted by the proposed works, will be mitigated prior to and during the construction of the Proposed Development in agreement with the DHLGH. On the basis of the geophysical survey and test excavation results, the*

National Monuments Service may require preservation in the form of in situ (by avoidance or design) or resolution by archaeological excavation. All mitigation practices will be carried out in accordance with the requirements of the statutory authorities.”

Section 20.6.1 of the chapter provides information on the role of the Project Archaeologist and the management of mitigation measures.

“A Project Archaeologist with a detailed knowledge of the Proposed Development will be appointed to develop and manage a centralised framework for tracking and managing all archaeological considerations. The Project Archaeologist will oversee the implementation and reporting of all archaeological and cultural heritage mitigation measures.

The role of the Project Archaeologist is to provide a consistent and independent approach throughout the duration of the Proposed Development.

In addition to this, a Project Archaeologist will:

- *Review and agree details of the archaeological monitoring and investigation.*
- *Review and agree the details of method statements, license applications and Ministerial Consents.*
- *Manage the archaeological contract and specifically the work of the archaeological contractors.*
- *Oversee the conduct of the archaeological excavations/ investigations.*
- *Review the archaeological requirements as the works proceed. Implement any required changes to the methodology as construction work proceeds.*
- *Certify all archaeological costs.*
- *Oversee all post excavation works and certify all post excavation costs.*
- *Review the content of reports prepared by the Archaeological Contractors and ensure that all the archaeological contractors provide all appropriate reports on their work in accordance with the contract conditions.*
- *Ongoing consultation with the heritage authorities and statutory authorities.*
- *Ensure all work is proceeding according to archaeological licensing or consent requirements.*
- *Identify the requirement for additional investigation, including where necessary recording, survey, testing or excavation works.*
- *Where possible implement time and cost-effective strategies that are in line with best practice guidelines and statutory authority approvals.*
- *Provide advice to Iarnród Éireann.*
- *Provide advice to the design, construction team and relevant contractors.”*

- f) Archaeological monitoring will take place in lands where no archaeological investigation can take place in advance due to access (land clearance, physical access under public, roads, carpark and permission, widening of culverts, diversion of

utilities), site conditions and soft ground issues to ensure that if further archaeological remains are revealed they will be identified and dealt with to the satisfaction of the National Monuments Service and in accordance with the Code of Practice between IE and the Minister for AHG, 2012 (NMS). The extent of monitoring (square metres) will emerge from the test excavation process and consultation with the Project Archaeologist and the National Monuments Service. Archaeological Monitoring is discussed under section 20.6.2.3.

g) Within Chapter 21 Architectural Heritage BH88 is discussed as follows:

“A new substation (north Skerries) is proposed at Barnageeragh. An access gate is proposed which will result in the removal of a section of walling associated with the small early 19th century settlement at Barnageeragh (BH-88). The pre-mitigation Construction Phase impact is Direct, Negative, Significant, Long term. The present wall is in poor condition. The proposed Mitigation includes recording the existing fabric in position prior to the works. Recording is to be undertaken by an appropriate architectural heritage specialist engaged by the appointed contractor. Following the creation of the 20m gate, the wall on either side of the gate shall be repaired. The masonry from the removed section is to be salvaged for repair and conservation works to the retained portions of the wall. Works to historic fabric will be carried out in accordance with the methodology provided in Appendix A21.1 in Volume 4 of this EIAR. With mitigation, the impact magnitude is reduced from high to low. The predicted post mitigation impact is Direct, Negative, Slight, Long term.” There is no suggestion that this section of walling was associated with Thomas Hand and family and the memorial to Thomas Hand shall be maintained as no works are proposed in this area (page 72, EIAR Volume 2: Chapter 20 Archaeology & Cultural Heritage).

It is understood that the birthplace of Thomas Hand and the farmstead belonging to the family was located in Baltrasna, a neighbouring townland to Barnageeragh where the section of walling will be removed.

h) Within the archaeological chapter the requested information is contained within Tables 20-25 (Zone A), 20-26 (Zone B), 20-27 (Zone C), 20-28 (Zone D), 20-29 (Zone E). Mitigation for these zones is discussed under the following sections of the chapter:

- 20.6.3.1 Zone A
- 20.6.3.2 Zone B
- 20.6.3.3 Zone C
- 20.6.3.4 Zone D – Meath
- 20.6.3.5 Zone E – Drogheda Station and surrounds

i) Please see the requested details in Table A-3 in Appendix A.

j) As stated above, the appointment of a Project Archaeologist will take place to manage the archaeological output in the context of the Proposed Development: Section 20.6,

EIAR Volume 2: Chapter 20 Archaeology & Cultural Heritage states “As part of the Code of Practice agreed between the Department of Arts, Heritage and the Gaeltacht (AHG) (now the Department of Housing, Local Government and Heritage) and Iarnród Éireann the role of the Project Archaeologist on Major Projects is outlined and detailed below in the context of this Proposed Development. The relationship between the Project Archaeologist and the Consultant Archaeologist(s) (Licence Holder/s) is also detailed in Appendix II of the Code of Practice (NMS 2012).”

14. Summary of Issue Raised

In respect of Architectural Heritage, the Meath County Council submission requests the following further information is sought:

1. *“MCC’s Archaeologist has noted the need to consider the WWII Emergency Pillbox on Irish Town Bridge, which are a heritage feature in the Boyne Valley area, and many are Protected Structures. This and any other Pillboxes should be considered in the Architectural Assessment with mitigation proposed where relevant. All vernacular and/or architectural structures that are proposed to be changed/ demolished within the red line project boundary and confirm a mitigation or a reason why no mitigation is necessary.*
2. *The Architectural Conservation Officer has requested further detail regarding specific details/ method of attaching the proposed infrastructure to the Laytown Viaduct structure.” In particular, the submission requests that: “to allow for an informed assessment as to the effect on the existing Laytown Viaduct Structure, detailed drawings illustrating the proposed method of attaching the new poles to the existing structure are required (with reference to 02-Volume 3B Photomontages - Figure: 15.3.45.2). In the event that any parapet or viaduct modification works to Gormanston/ Knocknagin Viaduct are proposed, such details should be provided.”*
3. *“Figure 15.3.41.1 – View G3 (from local access road, Irishtown) suggests the demolition of a structure, however no building assessment and mitigation is proposed. This structure appears on a 1939 Cassini map. please clarify whether vernacular structures or other architectural structures are missing from the assessment and provide a visual and descriptive record for each proposed to be changed/ demolished within the red line boundary. please also confirm any mitigation/reason for no mitigation.*

The Applicant is requested to provide a photographic and map regression index of architectural heritages supporting a site visit and detailed assessment of current condition and setting.”

Response to Issue Raised

The comments of Meath County Council are noted. The Applicant would note the detailed architectural heritage assessment which has been undertaken, as documented in Chapter 21 Architectural Heritage of the EIAR. The issues referenced under 1) and 2) above are

addressed in our response under Point 7 above. In respect of the point noted under 3) above, the Applicant references the response provided under Point 6 above (Gormanston Substation).

15. Summary of Issue Raised

In respect of Mitigation, the Meath County Council submission recommends that “*Chapter 27 of the EIAR - summary of mitigation measures is implemented by way of condition of planning. A Community Liaison Officer is also advised for each stage of the construction phase to provide advance notice to affected members of the public (where possible) and landowners/nearby residences (e.g. night work). It is noted that a Noise Liaison and Landowner Liaison Officer (LLO) are proposed, but other issues may arise (e.g. waste/ drainage/ road access, etc.)*”

Response to Issue Raised

The Railway Order, if granted, will require, even without any condition, that the development will be implemented in accordance with the plans, particulars and all of the documentation lodged, including the EIAR and therefore there is a commitment to implement all of those measures.

The Applicant would, however, have no objection should An Bord Pleanála deem it appropriate to attach such a condition to the Railway Order.

16. Summary of Issue Raised

In respect of Appropriate Assessment, the Meath County Council submission requests that:

- a) *“the RO includes measures to manage invasive species already within the control of Irish Rail and a management plan for the continued use of the rail line within this application. This includes species recorded in Zone D adjacent to Gormanston Railway Station (Spanish Bluebell) and Laytown (Common Cord-grass) which is present in the River Nanny Estuary. Construction activities may give rise to the introduction/ further spread along the rail track or adjoining lands within the county. For example, Section 7.1.12.3 (NIS) refers to the development of a pre-construction invasive species survey and mitigation in a Non-Native Invasive Species Management Plan. Such a plan needs to continue to be implemented over the operational period of the Project.*
- b) *It is recommended that a plan is agreed as part of the RO application to remedy the existing and historic contaminated lands along the rail-line, or which may result due to the continued operation of the rail line.*
- c) *It is also recommended that a dust suppression strategy is employed in consultation with the Environmental Dept.’s of the Local Authorities. Similarly, Resource and Waste Management Plans, Construction Environment Management Plans, Construction Traffic Management Plans and Air Quality Management Plans should be agreed with Environment and Transportation Departments of the Local Authorities. Where relevant Road Opening Licences may also be required by the Applicant.*

- d) *The NIS (Section 7.2.9) include a measure of mitigation for the retention of services of an Ecological Clerk of Works (EcOW) or Ecologist for a pre-construction survey (otter) and where a holt has been encountered. ABP are invited to consider a condition which requires follow up reports (over a suitable no. of years) which ensure that mitigation measures have been successfully implemented (e.g. lighting, OHLE measures for birds, etc.) and which applies to other mitigation proposals, rather than otter protection alone; and all other mitigation included in the NIS should be a condition of the Railway Order Application."*

Response to Issue Raised

In respect of each of the points above, the Applicant responds as follows:

1. In respect of the Non-Native Invasive Species Management Plan and the need to continue to implement that over the operational period of the Project, the Applicant would have no objection to such a condition being attached to any grant of permission.
2. In respect of contaminated land, the Applicant would refer to the response provided under Point 9 above. This demonstrates that the EIAR has comprehensively assessed the potential for impacts from any contaminated soils as a result of the Proposed Development (on soils, surface, coastal and groundwaters). This response also demonstrates that the EIAR has included all necessary measures to address the potential risk from contaminated soils arising from the Proposed Development during the construction and operational phases. The Applicant therefore considers that no additional measures are needed in respect of the Proposed Development.
 - a. The Applicant also notes that with the electrification of the Northern Line, the new electrical multiple units to be deployed under the DART+ Programme, will reduce significantly the risk of contamination from diesel spills, which will have a positive effect in terms of the risk of any future contamination along the rail line.
3. Chapter 12 Air Quality of the EIAR sets out a number of mitigation and monitoring measures for dust suppression to be undertaken during the construction phase, see Section 12.6.1 and 12.7.1 of the EIAR. These measures are also included in the Schedule of Commitments in the CEMP (Appendix A5.1) of the EIAR. The CEMP (which also includes the Construction and Demolition Waste Management Plan, Construction Traffic Management Plan and Incident Response Plan) will be further developed by the Contractor prior to the commencement of construction, in consultation with all relevant authorities, including Meath County Council. It is noted that Road Opening Licences may be required by the Applicant, this will be done in full consultation with the relevant local authority and in accordance with the relevant legislative requirements.

4. The Applicant notes the recommendation of Meath County Council in this regard and would have no objection to the imposition of such a condition on any grant of permission.

17. Summary of Issue Raised

The Meath County Council submission requests An Bord Pleanála, should the Railway Order be granted, to have regard to a recommended Schedule of Conditions.

Response to Issue Raised

The Applicant notes the recommended Schedule of Conditions. This schedule, together with the Applicants comments (if any) is included in Table 5 below:

Table 5 - Recommended Schedule of Conditions (MCC)

Nr.	Condition	Applicant Commentary
1	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application to An Bord Pleanála on the 12th July 2024, except as may otherwise be required to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity and proper planning and sustainable development.</p>	<p>The Applicant has no objection to this condition being attached to any grant of permission by An Bord Pleanála.</p>
2	<p>The Applicant shall appoint a Community Liaison Officer for all stages of the development and shall be the first point of contact for residents seeking information, making a complaint, etc. and shall be responsible for discharging information in relation to the Project to residents.</p> <p>Reason: In the interests of amenity and orderly development of the site</p>	<p>The Applicant has already included for a Community Liaison Officer to be appointed for the implementation of the works under DART+ Coastal North – see Appendix A5-1 Construction Environmental Management Plan which sets out the proposed Complaints Procedure and states that “A liaison officer will be available to allow for member of the public or interested parties to make complaints about the construction works. The CEMP will contain details of the complaints procedures and a monitoring system will be implemented to</p>

		<i>ensure that any complaints are addressed, and satisfactory outcome is achieved for all parties.”</i> The Applicant also notes that there is an existing Community Liaison Officer (CLO) who liaises with local residents on an ongoing basis along the railway line (which will continue during the operational phase). The Applicant has no objection to the proposed condition being applied for the implementation of the works under DART+ Coastal North, should the Railway Order be granted.
3	<p>The mitigation measures identified in the EIAR and AA NIS, and other particulars submitted with the planning application, shall be implemented in full by the developer, except as may otherwise be required. The developer shall appoint a person with appropriate ecological and construction expertise as Environmental Manager/ Ecological Clerk of Works to ensure that the mitigation measures identified in the documents are implemented in full.</p> <p>Reason: In the interests of proper planning and sustainable development.</p>	<p>The Applicant has no objection to this condition being attached to any grant of permission by An Bord Pleanála. The Applicant notes the reference to AA within this proposed condition and notes that this is not relevant, given that An Bord Pleanála is the competent authority for the purposes of Appropriate Assessment.</p>
4	<p>The Environmental Manager/ Ecological Clerk of Works shall monitor the implementation of</p> <p>mitigation measures for a period of 5 years post implementation.</p> <p>Reason: in the interests of proper planning and sustainable development.</p>	<p>The Applicant has no objection in principle to this condition being attached to any grant of permission by An Bord Pleanála for the implementation of mitigation measures during implementation of the railway works.</p>
5	<p>An Invasive Species Management Plan shall be developed and implemented over the operational lifetime of the Project with annual reporting of management.</p> <p>Reason: in the interest of environmental protection and orderly development.</p>	<p>The Applicant has prepared an Invasive Species Management Plan (ISMP), as Appendix 1.5 of the NIS submitted with the Railway Order application. This ISMP will be implemented over the lifetime of the Project and therefore it is considered that this condition is not required, however, the Applicant has no objection to this condition, should the Railway Order be granted.</p>

6	<p>The Applicant shall carry out all works in accordance with recommendations in the Inland Fisheries Ireland Guidance Document on Protection of Fisheries during Construction Works in and adjacent to Waters, 2016. Compliance with this condition shall be to the satisfaction of the Planning Authority.</p> <p>Reason: in the interest of environmental protection and the protection of water quality.</p>	<p>The plans, particulars and documentation lodged demonstrate that the scheme has had regard to the Inland Fisheries Ireland Guidance Document on Protection of Fisheries during Construction Works in and adjacent to Waters, 2016. A detailed Construction Environmental Management Plan (CEMP) has been prepared, see Appendix A5-1 of the EIAR and includes a Surface Water management Plan (SWMP) with a suite of measures to ensure that surface waters are appropriately protected during the construction of the DART+ Coastal North Project.</p>
7	<p>Archaeology</p> <p>(a) The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site.</p> <p>(b) A project archaeologist shall form part of the construction team, employed to implement the entire mitigation process until site archive is with the National Monument Service-NMt.</p> <p>(c) Mitigation includes full topsoil assessment for stray finds and artefacts including metal</p> <p>detecting at all Greenfield locations.</p> <p>(d) All structures shall be recorded (i.e. photographic, drawn, written) in their present condition before alteration. (Note: This shall apply to the whole structure and not only the element to be altered).</p> <p>(e) OBB80/OBB80A/OBB80(BBH -141) or any other structures which will be changed shall be recorded (i.e. photographic, drawn, written) in their present condition before alteration.</p>	<p>A full suite of mitigation and monitoring measures are set out in Chapter 20 Archaeology of the EIAR. The Applicant however has no objection in principle to this condition being attached to any Railway Order.</p>

	<p>Reason: To ensure the continued preservation (either in situ or by record) of any archaeological features or materials of archaeological interest and to conserve the archaeological heritage of the site</p>	
8	<p>Construction/Waste Management, etc.</p> <p>Prior to the commencement of development, the developer or any agent acting on its behalf shall prepare a Construction and Demolition Resource Waste Management Plan (RWMP) as set out in the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021) including demonstration of proposals to adhere to best practice and protocols. The RWMP shall include specific proposals as to how the RWMP will be measured and monitored for effectiveness; these details shall be placed on the file and retained as part of the public record. The RWMP must be submitted to the planning authority for written agreement prior to the commencement of development. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.</p> <p>Reason: in the interest of proper planning and sustainable development.</p>	<p>A Construction & Demolition Waste Management Plan has been prepared for the Proposed Development and is included as Appendix E of the Construction Environmental Management Plan (Appendix A5-1 of the EIAR). This CDWMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities. This CDWMP will be implemented over the lifetime of the Project and therefore it is considered that this condition is not required, however, the Applicant has no objection in principle to a condition as stated above being attached should the Railway Order be granted.</p>
9	<p>The site and building works required to implement the development shall only be carried out between the hours of 8.00am to 6.00pm Monday to Friday and 8.00 am to 2.00pm on Saturdays. No activity on site Sundays and Bank Holidays. In exceptional circumstances hours of operation may be extended for a specified period of time subject to written agreement from the Planning Authority.</p>	<p>The Applicant would have very serious concerns around a condition of this type, given the nature of the works and the need to minimise disruption to the operational railway.</p> <p>While general construction works away from the railway line (e.g. substation construction) will be undertaken during normal construction hours (see Chapter 5 Construction Strategy of the EIAR, Section 5.2.2), it is noted that the construction of the DART+ Coastal North Project requires track possessions (i.e.</p>

	<p>Reason: in the interest of residential amenities of the area.</p>	<p>temporary track closures) to enable construction works to be completed.</p> <p>As detailed in Section 5.2.2 of the EIAR, “<i>In general, night-time possessions will be utilised, but it is anticipated that a number of daytime and weekend possessions will also be required, to accommodate the construction works. These possessions will be planned with other railway works and peak railway user demand periods in mind.</i>” The track possession types and durations are set out in Table 5-3 of the EIAR.</p> <p>Given that some works will often need to be undertaken when the railway is closed to train services, a number of the construction compounds will often need to be active at night and at weekends, to allow Contractors to marshal construction plant and materials, involving both road and rail vehicles.</p> <p>As detailed in Section 5.2.2 of the EIAR: “<i>Any proposed track possession periods will be finalised when detailed design and detailed construction planning is undertaken. For the purposes of the EIAR a reasonable worse case has been assumed here and for the assessments undertaken in Chapters 6 to 27 in Volume 2 of this EIAR.</i>”</p> <p>For the reasons noted above, the Applicant respectfully requests that this condition is not attached to any grant of permission, as was the case for both DART+ West and DART+ Southwest.</p>
10	<p>a) The Applicant shall prepare a Waste Management Plan (WMP) for the Proposed Development for the written approval of the planning authority prior to the commencement of any site activity. The WMP shall include but not be limited to project description, legislation requirements, demolition waste, construction phase waste, categories of construction waste, anticipated hazardous waste, non-</p>	<p>a) It is noted that the proposed Condition 8 above is very similar to this proposed condition. The Applicant notes that a Construction & Demolition Waste Management Plan has been prepared for the Proposed Development and is included as Appendix E of the Construction Environmental Management Plan (Appendix A5-1 of the EIAR). This CDWMP (as part of the CEMP) will be further developed by the Contractor</p>

	<p>construction waste, segregation of waste streams, estimated waste generated, waste hierarchy and adherence to same, roles and responsibilities and communication of WMP, details of recovery and disposal sites, details of waste hauliers, record keeping and documentation, waste audit procedures. The WMP shall be prepared in accordance with Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects (2006) and Guidelines for the Management of Waste from National Road Construction Road Projects (Rev. 2014), the WMP shall also take cognisance of the current Regional Waste Management in particular to the upper tiers of the Waste Hierarchy. All waste generated on site shall be recovered/ disposed of at an authorised facility and transported by an authorised collector. The WMP shall be treated as a live document and communicated to all relevant personnel.</p> <p>b) The construction of the development shall be managed in accordance with a Construction and Environmental Management Plan (CEMP), which shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. The CEMP shall provide details of intended construction practice for the development, including but not be limited to operational controls for dust, noise and vibration, construction traffic management, waste management, protection of soils and groundwaters, protection of flora and fauna, site housekeeping, emergency</p>	<p>prior to construction in consultation with the relevant local authorities. The CDWMP will be implemented over the lifetime of the Project and therefore it is considered that this condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p> <p>b) A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This CEMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities and therefore it is considered that the proposed condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p> <p>c) A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This CEMP addresses preparatory works on site, including the protection of surface waters (through the Surface Water Management Plan which is included therein). This CEMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities and therefore it is considered that the proposed condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p>
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	<p>response planning, site environmental policy, environmental regulatory requirements and project roles and responsibilities. The CEMP shall also address extreme of weather (drought, wind, precipitation, temperature extremes) and the possible impacts on receptors and mitigation of same. The CEMP shall be treated as a live document.</p> <p>c) The CEMP shall include preparatory works on the site, including installation of silt fences.</p> <p>d) Appropriate preventative measures should be detailed within the CEMP to ensure that nonnative invasive species (aquatic and/or terrestrial) are not introduced into or transferred out of the site.</p> <p>e) Dust emissions at the site boundaries shall not exceed 350mg/m²/day.</p> <p>f) All refuelling shall take place in a designated refuelling area at least 30m from watercourses, details of same to be included in the CEMP.</p> <p>g) All hydrocarbons, chemicals, oils, etc. shall be stored in a dedicated bunded area at least 30m from watercourses and capable of storing 110% of the container/tank capacity.</p> <p>h) The Applicant shall ensure adequate supply of spill kits and hydrocarbon absorbent pads are stocked on site</p> <p>i) Burning of waste, including green waste, is prohibited on site.</p>	<p>d) Please see the response to proposed Condition No. 5 above. An ISMP has been prepared and is included in the Railway Order Application. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p> <p>e) As detailed above, a CEMP has already been prepared for the Proposed Development. This includes in respect of monitoring measures during construction, to monitor the effects of dust during construction, relative to the TA Luft limit value of 350 mg/m²/day. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p> <p>f) As detailed above, a CEMP has already been prepared for the Proposed Development. This includes a requirement for <i>“Refuelling of all plant, machinery, and vehicles will be undertaken only in designated areas where leaks and spills are can be contained relatively easily. Spill kits will be made available on all temporary and permanent construction sites. Refuelling areas must be kept at least 50m away from any watercourse.”</i></p> <p>g) As detailed above, a CEMP has already been prepared for the Proposed Development. This includes a requirement that <i>“Bunds of non-erodible material will be used adjacent to watercourses to avoid contaminated water entering the watercourse as far as reasonably practicable.”</i> The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is</p>
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<p>j) The Applicant shall, during the construction stage, maintain a Complaints Register to record any complaints regarding but not limited to noise, odour, dust, traffic or any other environmental nuisance. The Complaint Register shall include details of the complaint and measures taken to address the complaint and prevent repetition of the complaint.</p> <p>k) in the event it is necessary to import soil and stone or topsoil for any element of the Proposed Development to Applicant shall ensure a Certificate of Registration or Waste Facility Permit as per the Waste Management (Facility and Registration) Regulations 2007, as amended is secured in advance of the works.</p> <p>l) During the construction phase noise levels at noise sensitive locations shall not exceed 70dB(A) between 0700 to 1900 hours Monday to Friday and 0800 to 1400 hours Saturday and 45dB(A) at any other time. Noise exceedance activities must be agreed in writing with the planning authority prior to the activity taking place.</p> <p>m) During construction the developer shall provide adequate off carriageway parking facilities for all traffic associated with the Proposed Development, including delivery and service vehicles/trucks. There shall be no parking along the public road.</p> <p>n) The Applicant shall provide to the Local Authority, on completion of the works, a comprehensive report detailing the management of all waste streams generated during the construction and commissioning</p>	<p>part of the plans and particulars submitted with the Railway Order application.</p> <p>h) As detailed above, a CEMP has already been prepared for the Proposed Development. This includes a requirement that <i>“Emergency spill kits will be retained at sensitive locations, with portable kits provided to plant and equipment operators.”</i> The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p> <p>i) The Applicant has no objection to a condition being attached to the Railway Order, if granted, such that burning of waste, including green waste, is prohibited on site.</p> <p>j) As detailed above, a CEMP has already been prepared for the Proposed Development, which includes details of the proposed complaints procedure and the complaints register. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application</p> <p>k) As detailed above, a CEMP has already been prepared for the Proposed Development and includes a Construction Demolition Waste Management Plan. This includes a requirement that the Contractor has all necessary Certificates of Registration or Waste Facility Permit as per the Waste Management (Facility and Registration) Regulations 2007, as amended in place in advance of the works. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is</p>
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	<p>stages of the Project. This shall include but not be limited to type of waste streams, amount of each waste stream generated, destination of waste streams (including final destination if applicable), percentage of waste re-used, recycled, recovered and disposed, and prevention and minimisation initiatives undertaken.</p> <p>o) The construction works shall be carried out in accordance with the noise guidance set out by BS 5228-1:2009 Code of Practice for Noise and Vibration Control on Construction and 94 Open Sites and the NRA Guidelines for the treatment of Noise and Vibration in National Roads Schemes.</p> <p>Reason: in the interest of sustainable waste management, environmental protection, public health and safety and residential amenity, and orderly development.</p>	<p>part of the plans and particulars submitted with the Railway Order application.</p> <p>l) The Applicant would have very serious concerns around a condition of this type, given the nature of the works and the need to minimise disruption to the operational railway.</p> <p>While general construction works away from the railway line (e.g. substation construction) will be undertaken during normal construction hours (see Chapter 5 Construction Strategy of the EIAR, Section 5.2.2), it is noted that the construction of the DART+ Coastal North Project requires track possessions (i.e. temporary track closures) to enable construction works to be completed.</p> <p>As detailed in Section 5.2.2 of the EIAR, “In general, night-time possessions will be utilised, but it is anticipated that a number of daytime and weekend possessions will also be required, to accommodate the construction works. These possessions will be planned with other railway works and peak railway user demand periods in mind.” The track possession types and durations are set out in Table 5-3 of the EIAR.</p> <p>Given that some works will often need to be undertaken when the railway is closed to train services, a number of the construction compounds will often need to be active at night and at weekends, to allow Contractors to marshal construction plant and materials, involving both road and rail vehicles.</p> <p>As detailed in Section 5.2.2 of the EIAR: “Any proposed track possession periods will be finalised</p>
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		<p>when detailed design and detailed construction planning is undertaken. For the purposes of the EIAR a reasonable worse case has been assumed here and for the assessments undertaken in Chapters 6 to 27 in Volume 2 of this EIAR.”</p> <p>For the reasons noted above, the Applicant respectfully requests that this condition is not attached to any grant of permission, as was the case for both DART+ West and DART+ Southwest.</p> <p>m) As detailed above, a CEMP has already been prepared for the Proposed Development. This includes a Construction Traffic Management Plan (CTMP). The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p> <p>n) As detailed above, a CEMP has already been prepared for the Proposed Development. This includes a Construction & Demolition Waste Management Plan (CDWMP). The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p> <p>o) The Applicant refers to the responses given in respect of proposed Conditions 9) and 10 l) above. The Applicant has had regard to BS 5228-1:2009 Code of Practice for Noise and Vibration Control on Construction and 94 Open Sites and the NRA Guidelines for the treatment of Noise and Vibration in National Roads Schemes in the Railway Order application.</p>
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		<p>The Applicant would have very serious concerns around a condition of this type, given the nature of the works and the need to minimise disruption to the operational railway. While general construction works away from the railway line (e.g. substation construction) will be undertaken during normal construction hours (see Chapter 5 Construction Strategy of the EIAR, Section 5.2.2), it is noted that the construction of the DART+ Coastal North Project requires track possessions (i.e. temporary track closures) to enable construction works to be completed.</p> <p>As detailed in Section 5.2.2 of the EIAR, “In general, night-time possessions will be utilised, but it is anticipated that a number of daytime and weekend possessions will also be required, to accommodate the construction works. These possessions will be planned with other railway works and peak railway user demand periods in mind.” The track possession types and durations are set out in Table 5-3 of the EIAR.</p> <p>Given that some works will often need to be undertaken when the railway is closed to train services, a number of the construction compounds will often need to be active at night and at weekends, to allow Contractors to marshal construction plant and materials, involving both road and rail vehicles.</p> <p>As detailed in Section 5.2.2 of the EIAR: “Any proposed track possession periods will be finalised when detailed design and detailed construction planning is undertaken. For the purposes of the EIAR a reasonable worst case has been assumed here and for the</p>
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		<p>assessments undertaken in Chapters 6 to 27 in Volume 2 of this EIAR.”</p> <p>For the reasons noted above, the Applicant respectfully requests that this condition is not attached to any grant of permission, as was the case for both DART+ West and DART+ Southwest.</p>
11	<p>The developer shall develop a programme for remediation of contaminated land along/ under the rail-line and implement remediation measures over the operational life of the railway line.</p> <p>Reason: in the interest of environmental protection.</p>	<p>In respect of this proposed condition, the Applicant would refer to the response provided under Point 9 and Point 16 above. This demonstrates that the EIAR has comprehensively assessed the potential for impacts from any contaminated soils as a result of the Proposed Development (on soils, surface, coastal and groundwaters). This response also demonstrates that the EIAR has included all necessary measures to address the potential risk from contaminated soils arising from the Proposed Development during the construction and operational phases. The Applicant therefore considers that no additional measures are needed in respect of the Proposed Development.</p>
12	<p>The public road shall be maintained clean and free of any dirt or debris created as a result of the Proposed Development.</p> <p>Reason: in the interest of traffic safety and proper planning and sustainable development.</p>	<p>A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This CEMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities and therefore it is considered that the proposed condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p>
13	<p>A pre-site clearance survey for protected species shall be carried out across the site a maximum of 3 months prior to site clearance. This shall include an assessment for bat roosts. The Applicant shall liaise with the NPWS for appropriate guidance. Any</p>	<p>A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This includes details of all necessary pre-construction surveys for protected species. This CEMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities and</p>

	<p>works relating to bats may only be carried out under a licence issued by the NPWS.</p> <p>Reason: in the interest of environmental protection and orderly development.</p>	<p>therefore it is considered that the proposed condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p>
14	<p>Any significant works to bridges over rivers or streams shall be carried out in accordance with the National Roads Authority guidelines for the treatment of otters.</p> <p>Reason: To comply with requirements for the protection of breeding otters.</p>	<p>A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This CEMP includes specific reference to the Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes (TII, 2006).</p> <p>This CEMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities and therefore it is considered that the proposed condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p>
15	<p>Landscaping</p> <p>a) Landscaping shall be carried out as detailed on the site plan submitted on the XX/XX/XX unless otherwise agreed. Existing hedgerows, trees and shrubs on site shall be preserved, except where required to be removed to accommodate the entrance. New site boundaries shall consist of timber fencing back planted with hedgerow of species native to the area.</p> <p>b) Planting shall commence no later than the first planting season following commencement of development on site. Any plants which die, are removed or become seriously damaged or diseased, within a period of five years from the completion of the development, shall be replaced within the next</p>	<p>A detailed landscaping design has been prepared and is included in the Railway Order application, see the detailed CEMP, in Appendix A5-1 and the landscape mitigation drawings (see Figures 15.3 in Volume 3A of the EIAR).</p> <p>The Applicant has no particular objection to this condition being attached to any grant of permission by An Bord Pleanála but notes the reference to “the entrance” which may not be wholly applicable to the DART+ Coastal North Project, given the extents of the scheme.</p>

	<p>planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.</p> <p>Reason: To protect the visual amenity and natural heritage of the area.</p>	
16	<p>Prior to the commencement of any other site works all existing trees to be retained shall be fenced off. This must be at a distance of the crown spread (the outer drip-line of the tree) or half the tree height, whichever is the greater. Fencing shall be at least 1.2m high cleft chestnut pale or chain link, well braced to resist impacts or similar to be agreed in writing with the planning authority. These works shall be undertaken before any equipment, machinery or materials are brought on to the site for the purposes of the development and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within these areas shall not be altered, nor shall any excavation be made or any other works carried out, or fires lit without the prior written consent of the planning authority.</p> <p>Reason: To ensure the protection of trees and other vegetation to be retained and to ensure the continuity of amenity afforded by existing trees.</p>	<p>A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This includes specific requirements with regard to the protection of trees, including that <i>“Retained trees will be fenced off at the outset of works (i.e., at compounds and substations), and for the duration of construction to avoid structural damage to the trunk, branches, or root system of the tree which could disturb roosting bats. Temporary fencing will be erected at a sufficient distance from the tree so as to enclose the Root Protection Area (RPA) of the tree. The RPA will be defined based upon the recommendation of a qualified arborist;”</i> and that <i>“All trees and vegetation to be retained within and adjoining the works area will be protected in accordance with the British Standard Institution (BSI) British Standard (BS) 5837:2012 ‘Trees in relation to in relation to design, demolition, and construction - Recommendations’ (BSI 2012).”</i> The CEMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities and therefore it is considered that the proposed condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p>
17	<p>Trees and hedgerows shall not be removed during the nesting season (i.e. March 1st to August 31st) in accordance with the Wildlife Act (as amended). Replacement hedgerows shall be of native species.</p>	<p>A detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR. This CEMP includes a requirement that <i>“Vegetation clearance should be programmed as far as is reasonably practicable to avoid the bird nesting season (March to August inclusive)”</i> and that <i>“tree removal, particularly</i></p>

	<p>Reason: in the interest of avian ecology and visual amenity.</p>	<p><i>where understorey vegetation is abundant will be undertaken outside of the bird nesting season.</i>" This CEMP will be further developed by the Contractor prior to construction in consultation with the relevant local authorities and therefore it is considered that the proposed condition is not required. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p>
18	<p>Surface Water</p> <p>All surface water from roofs, entrances, paved areas, footpaths, surface and car parking areas shall be collected and disposed of within the site to the surface water drainage system and under no circumstances shall discharge to the public foul sewer.</p> <p>Reason: To ensure orderly collection, treatment and disposal of surface water and in the interests of road safety and environmental health.</p>	<p>The plans, particulars and documentation submitted with the Railway Order application include full details of the proposals with respect to surface water. No discharges to the public foul sewer are proposed. The Applicant has no objection in principle to this condition being attached to any grant of permission by An Bord Pleanála.</p>
19	<p>Public Lighting/Flood Lighting</p> <p>(a) Prior to the commencement of development, any public lighting designs proposed shall</p> <p>demonstrate that obtrusive light is mitigated and appropriate for the external lighting of the</p> <p>development. Details shall be agreed in writing with the Planning Authority. The public lighting shall not conflict with the agreed landscaping scheme.</p> <p>(b) All floodlights shall be cowed to divert light away from the public road and from residential properties in the vicinity.</p>	<p>Any public lighting associated with the DART+ Coastal North Project has been fully considered, designed in accordance with all relevant technical standards and full details of our proposals in this regard have been provided in our Railway Order application and the accompanying drawings.</p>

	Reason: To protect residential amenities and in the interest of traffic safety/ public safety.	
20	<p>Services</p> <p>All service cables associated with the Proposed Development (such as electrical, communal television, telephone and public lighting cables) shall be run underground within the site.</p> <p>Reason: in the interest of orderly development and the visual amenities of the area.</p>	<p>The plans, particulars and documentation submitted with the Railway Order application provide full details of the proposed with regard to services. Other than the OHLE (which will be overhead) all other service cables will be buried or will be laid within cable troughs along the railway line. The Applicant has no objection to a condition being attached to any Railway Order grant of permission, such that:</p> <p><i>“All service cables (with the exception of the OHLE for the electrification of the railway line) associated with the Proposed Development (such as electrical, communal television, telephone and public lighting cables) shall be run underground or where appropriate, laid within cable troughs within the site.”</i></p>
21	<p>No development exempted or otherwise shall be erected over the public sewer, drain or watermain.</p> <p>Reason: in the interest of public health.</p>	<p>The DART+ Coastal North Project is the subject of a Railway Order and therefore, the Applicant considers that proposed Condition No. 21 is inappropriate in these circumstances.</p>

4. RESPONSE TO SUBMISSIONS BY PUBLIC AND PRESCRIBED BODIES

4.1 SB0037 - Commission for Railway Regulation

1. Summary of Issue Raised

The submission from the Commission for Railway Regulation makes the following observations with respect to the Proposed Development:

- The CRR acknowledge application for the Railway Order for DART+ Coastal North.
- The CRR will engage with the Applicant for approval in accordance with the CRR's remit under the Railway Safety Act 2005, as amended.

Response to Issue Raised

The Applicant notes the submission by CRR in this respect and is committed to continued engagement with the CRR in respect of its remit under the Railway Safety Act, 2005, as amended.

4.2 SB0042 - Development Applications Unit (DAU)

1. Summary of Issue Raised

The Department recommends that the Project Archaeologist coordinate with the Department and Planning Authority to agree on a strategy for archaeological works, including advance test excavations and monitoring.

Response to Issue Raised

The Applicant would note the detailed archaeology and cultural heritage assessment which has been undertaken, as documented in Chapter 20 (Archaeology and Cultural Heritage) of the EIAR. Section 20.6.1 details the role of the Project Archaeologist which will be implemented during the construction Phase. The Project Archaeologist will oversee the implementation and reporting of all archaeological and cultural heritage mitigation measures. It is noted that the Project Archaeologist role includes:

- *“Review the content of reports prepared by the Archaeological Contractors and ensure that all the archaeological contractors provide all appropriate reports on their work in accordance with the contract conditions*
- *Ensure all work is proceeding according to archaeological licensing or consent requirements.*
- *ongoing consultation with the heritage authorities and statutory authorities”.*

This will ensure coordination with the Department and the relevant planning authorities.

2. Summary of Issue Raised

The Department recommends the strategy must include the location, extent, and method of marking exclusion zones around vulnerable heritage assets to be preserved in situ.

Response to Issue Raised

All features of a cultural heritage significance have been identified and mapped in Volume 3A of the EIAR (Figures 20.1), this understanding of the significance of heritage assets has allowed a strategy of avoidance to be developed for this Project, allowing preservation in situ. With consultation from the statutory authorities, these zones of archaeological potential (ZAP) and areas of archaeological potential can be developed into exclusion zones where required.

These exclusion zones will demarcate the most external elements of vulnerable heritage assets that are to be preserved in situ (as identified in Chapter 20 (Archaeology & Cultural Heritage) in Volume 2 of the EIAR or through archaeological investigation).

3. Summary of Issue Raised

The Department recommends that the CEMP must detail all archaeological and cultural heritage constraints, impacts, and mitigation measures relevant to the development.

Response to Issue Raised

The CEMP applies to all works associated with the Proposed Development. As a contractor has not yet been appointed, the CEMP has not been formally adopted and further development and commitment to the CEMP will be undertaken following selection of Contractors and before commencement of site works. The CEMP includes Appendix A - Environmental Impact Assessment Report Chapter 27 (Summary of Mitigation and Monitoring Measures) - as a supporting document.

As noted within Appendix A of the CEMP, mitigation measures within Chapter 27 of the EIAR must be complied with by the contractor. Section 27.2.15 of Appendix A lists the mitigation measures that must be complied with by the contractor. These measures include:

- employment of a Project Archaeologist by Iarnród Éireann,
- employment of a Consultant Archaeologist by the Contractor,
- archaeological test excavation in advance of the construction,
- measures to protect newly revealed archaeological remains,
- archaeological monitoring during the Construction Phase and
- zone specific mitigation measures which highlight Areas of Archaeological Potential (AAPs) that have been identified in Chapter 20 of the EIAR. These AAPs include

specific archaeological mitigation that the contractor needs to comply with as detailed in Chapter 20.

- As noted in Chapter 20 of the EIAR, all mitigation measures will be undertaken in compliance with national policy guidelines and statutory provisions for the protection of the archaeological heritage

4. Summary of Issue Raised

The Department recommends that the final report detailing the results of all archaeological monitoring and investigations to be submitted to the Planning Authority and the Department after the completion of all archaeological work.

Response to Issue Raised

All archaeological work will take place under licence to the National Monuments Service and the National Museum of Ireland. In fulfilment of this licence a fully illustrated report will be issued to the statutory authorities detailing the archaeological findings and recommendations.

All post-excavation work shall be carried out to the satisfaction of the Project Archaeologist and the National Monuments Service. All costs associated with recording, reporting and post excavation work, taken out under licence, shall be agreed with and borne by the Applicant.

As stated in Chapter 20 of the EIAR section 20.6.2.1, the detailed technical reports arising from the archaeological investigations will form part of the national archive of archaeological data in the Sites and Monuments record curated by the DHLGH.

5. Summary of Issue Raised

The Department states that the gate at the Turvey/Pill Stream prevents otters from moving directly from the Outer Malahide Estuary into the stream, forcing them to cross the railway tracks. Despite survey work not finding evidence of otters crossing the railway line, the Department supports the installation of the otter tunnel based on field signs indicating otter activity.

The Department recommends installing an otter tunnel under the railway line to allow safe passage for otters and reduce mortality. The design of the otter tunnel should account for the Malahide to Newbridge House Greenway, which is being constructed along the railway embankment.

The submission states that the current plan for the otter tunnel does not consider the greenway, and adjustments are needed to ensure the tunnel extends under the greenway and exits near the Turvey/Pill Stream. It recommends that suitable shrubs should be planted to obscure the exits of the otter tunnel, enhancing its effectiveness and safety for otters.

Response to Issue Raised

The Applicant acknowledges and welcomes the NPWS support for the installation of the otter tunnel.

As detailed within the EIAR, trail cameras were deployed at both sides of the railway line at the River Turvey/Pill Stream in August/September 2023, and otter surveys were conducted in this area to identify any signs of otter usage in this area. Whilst evidence was not identified at the time of survey, and otters were not observed on any of the trail camera footage, it is acknowledged in the EIAR that otters may still be using the railway line to cross to the other side of the railway due to the sluice gate blocking egress underneath the railway. Therefore, with the increase in the frequency of trains for the Proposed Development, otters are at an increased risk of mortality in this area where they cross the railway line. As stated in the EIAR, this is not considered likely to result in a population level effect that would affect the species conservation status and result in a significant effect at any geographic scale. Indeed, the Applicant notes that the EIAR, in Chapter 8 Biodiversity (Section 8.8.2.3.30) states that, prior to the implementation of any mitigation measures, *“given the relatively low numbers that might be expected to be affected in Malahide and in other areas along the Proposed Development, and that these species are highly mobile, the risk of mortality due to mortality from trains is unlikely to result in a level of mortality that would affect the species’ conservation status, and result in a significant effect, even at a local geographic scale”*.

Nonetheless, mitigation is proposed within the EIAR (see Chapter 8 Biodiversity and in particular Section 8.9.2.3.3 therein) to prevent otters from mortality impacts, with the implementation of the otter tunnel adjacent to the River Turvey/Pill Stream.

The proposed otter crossing will comprise a 600mm diameter pipe (as per TII guidance 2006c) and will pass beneath the railway close to Underbridge UBB31. The otter tunnel has been proposed as close to the sluice gate as possible, whilst ensuring that it would remain above the high tide level and therefore, always be dry and remain suitable for crossing otters. At either end of the pipe, an otter-proof fence will extend for at least 100m in each direction, to encourage the otters to make use of the crossing. The fence is partially buried to prevent the otters from burrowing beneath.

A consultation was held with NPWS on the 10th of November 2023, in which the otter tunnel was discussed. It is noted that NPWS were satisfied with the principle of the proposed otter tunnel under the railway line, as NPWS staff have noted otter usage there in the past.

It was not suggested at that time to extend the otter tunnel underneath the Broadmeadow Way. Notwithstanding, the Applicant has considered this recommendation by NPWS and would have no objection to a condition being attached to any Railway Order grant of permission, such that *“the landward side of the railway line fencing, leading from the otter tunnel, would be modified to include a wider splay guiding otters directly to the River Pill between the railway embankment and Broadmeadow Way, including vegetation to screen the fence from the Broadmeadow Way side.”*

Given the elevated nature of the Broadmeadow Way across the River Pill, it is considered that there is no practical way for other commuting under the railway line crossing point to access this area, which itself includes mammal proof fencing.

4.3 SB0057 - Fáilte Ireland

1. Summary of Issue Raised

The submission highlights the importance of the region from a tourism perspective and points out that *“international tourists visiting here expect a high-quality transport system. Therefore, an efficient and reliable public transport system is a key requirement and enabler to creating a great tourist experience, particularly in Dublin where tourists tend to use public transport more than in other parts of the country.”*

Response to Issue Raised

The Applicant notes and welcomes the view of Fáilte Ireland in this regard. The primary objective of the DART+ Coastal North Project is to deliver the infrastructure to enable increased train frequency and capacity between Drogheda and Howth and Dublin City Centre. As detailed within the Railway Order application, (see in particular Chapter 4 Description of the Development in the EIAR), the DART+ Coastal North Project will, if consented, *“deliver an improved and extended electrified rail network and will enable increased passenger capacity and an enhanced train service between Dublin City Centre and Drogheda, including the Howth Branch.”* This increased train frequency and capacity will help to deliver a sustainable, efficient, reliable public transport system, enabling the tourism industry across the region it serves.

2. Summary of Issue Raised

The submission notes that *“there are a number of principle typical day trips within the DART network. Some of these include the coastal villages in the north and south of the county, Dublin/ Wicklow Mountains (start of the Wicklow Way) popular for outdoor activities including walking/hiking and cycling and to large scale attractions. The extension of DART+ Coastal North to Drogheda will also improve access to Ireland’s Ancient East and the Boyne Valley and presents an opportunity to drive visitor flow to Drogheda and wider hinterland”*. The submission points to recent launch by Fáilte Ireland of the Dublin Coastal Trail, which *“is the culmination of a 4-year orientation programme with key industry stakeholders including Irish Rail. The Trail begins at Skerries and runs to Killiney, with signage installed in 11 towns and villages along the route, including the DART stations highlighting key visitor attractions and experiences along the way”*. In this regard, the submission recommends that *“the tracking of visitor flow on these routes should be considered, which would allow for an understanding of footfall to the coastal towns and villages”*. It further notes, in this context, that *“the extension of the network and more frequent services are very much welcomed”* and further notes that *“DART services and transport hubs are not only important for visitors themselves but, of equal importance, to those employed in the hospitality sectors, who are often critically dependent upon public transport, often at times at the very beginning and end of the working day”*.

Response to Issue Raised

The Applicant notes and welcomes the comments of Fáilte Ireland in this regard, particularly regarding the extension of the network and more frequent services. In respect of the tracking of the visitor flow on the DART routes, our regular customer satisfaction monitoring does not get down to granular detail of the purpose of customers' journeys, but the Applicant is happy to add pre-agreed questions to our surveys in the future, if Fáilte Ireland wishes. The Applicant would make a general note that it would have no objection to Fáilte Ireland undertaking surveys at stations. The Applicant is happy to work with Fáilte Ireland in this regard.

3. Summary of Issue Raised

The submission notes that *“orientation for tourists unfamiliar with Ireland can be poor”* and suggests that *“there is an opportunity to improve orientation for tourists at all stations along the DART+ network to improve the interpretation and dissemination of tourist transport information. These systems should recognise and consider the visitors' needs and requirements, particularly their lack of familiarity with their surroundings”*.

Response to Issue Raised

The Applicant appreciates that tourists can find it challenging to navigate unfamiliar transport networks. Much work has been undertaken in recent years to improve station way finding. The designs are clear and easy to understand, focusing on less words and more pictographs. This has been well received by customers. In the current DART fleet, the audio announcements and passenger information system can be unreliable. This is due to the age of the system. The new fleet has a much-improved passenger information system and the audio announcements will also be much improved. Each DART carriage features a map that shows the entire DART network, which also helps with orientation.

We are also displaying the Dublin Coastal Train branding in our coastal stations to indicate our support for the initiative. Our station staff, particularly in busy tourist stations are familiar with the attractions of their area and are always happy to share details with tourists.

4. Summary of Issue Raised

The submission welcomes the significant upgrades proposed at Howth Junction & Donaghmede Station and notes that these upgrades *“should both improve the passenger experience generally and develop the station to better serve as an interchange station going forward. As an interchange station, the role Howth Junction & Donaghmede Station plays from a tourism perspective will be crucial as tourists will be required to change at this station to go to Howth and use the proposed shuttle services to get to this key coastal village. This would require passengers to transfer between platforms to board connecting services and in other scenarios the interchange would potentially be from one side of a platform to the other. This underlines the requirement to ensure the station is more accessible, user friendly and customer focused station for all rail users including tourists.”*

Response to Issue Raised

The Applicant notes and welcomes the Fáilte Ireland submission in this regard and its views that the proposed upgrades will improve passenger experience and ensure the station is better placed to serve as an interchange station going forward. We acknowledge that this is also very important from a tourism perspective and the proposed upgrades, which include *“modifications to the station entrances to provide a more accessible, user friendly and customer focussed station for Donaghmede and Kilbarrack. Upgrades are proposed to the station footbridge and connections to the centre platforms, as well as to the lighting, CCTV system, signage and finishes throughout. The improvement at the Donaghmede entrance will also provide direct access to Platform 4 and connectivity via the footbridge”* will help to deliver on this objective.

5. Summary of Issue Raised

The submission notes that *“for visitors, changing trains is nothing new and is something that is expected in capital cities”*. It further notes, in respect of the proposed DART shuttle service that *“ultimately from a visitor perspective, their key consideration is that services are both more frequent and more reliable. Generally, visitors may utilise DART+ outside of the morning peak and any final operational decisions, relating to the potential for the operation of a shuttle service on the Howth Branch in future together with when/how this shuttle would operate (e.g. during peak times, etc) must take into consideration the needs and travel patterns of visitors to and from Howth”*.

Response to Issue Raised

The Applicant notes and welcomes the views of Fáilte Ireland that for visitors, changing trains is nothing new and that the key consideration is that services are both more frequent and more reliable.

In respect of the final operational timetable decisions, the Applicant has been clear, throughout the non-statutory public consultation process and in the application documentation that, while the Proposed Development seeks to make the infrastructural changes which would enable these operational changes, the implementation of these operational changes is not part of the DART+ Coastal North Project. There will be different phases of timetable development that will be gradually introduced as the Project builds towards maximum level of service. The operational detail behind each of these phases has not been worked through at this early stage in the Project planning and development. Any substantial timetable change will go through a Public Consultation process of its own organised by the National Transport Authority (NTA) known as the Timetable Customer Consultation Process. The Applicant would welcome the involvement of Fáilte Ireland in this consultation process.

6. Summary of Issue Raised

The submission notes that *“the publicity and information regarding the transportation of bikes on DART services should be improved”* and further notes that *“at present, there are a number of different policies around the carrying of bicycles and restrictions depending on the service.”*

Such restrictions and lack of clarity and awareness amongst visitors has the potential to curtail the growth potential of this sector. As most visitors to Dublin do not have their own bikes, there is an opportunity to enhance the provision of shared bike schemes at relevant stations as part of DART+ where appropriate”.

Response to Issue Raised

Iarnród Éireann's policy on travelling with bikes is clearly set out here [Bicycle Information for Rail Travel](#). We cannot accommodate non folding bikes onboard DART & Commuter trains at peak times. Bikes can be accommodated on board during off-peak periods and as acknowledged by Fáilte Ireland in its submission the majority of tourists do not travel during peak periods. The Applicant also notes that the new DART+ fleet has dedicated bike storage spaces.

In respect of shared bike schemes at stations, as noted under the response to Point 1 above, and as detailed within the Railway Order application, (see in particular Chapter 4 Description of the Development in the EIAR), the DART+ Coastal North Project will, if consented, *“deliver an improved and extended electrified rail network and will enable increased passenger capacity and an enhanced train service between Dublin City Centre and Drogheda, including the Howth Branch.”*

To that end, works to improve pedestrian and cycle connectivity at stations are not included in the DART+ Coastal North Project. However, as detailed in the EIAR, Chapter 26 Cumulative Effects (Table 26-6 Cumulative Assessment of DART+ Coastal North with Other projects), there are other parallel projects which are looking at these aspects.

In the above referenced table in the EIAR, reference is made to the Multimodal Interchange Project, which will *“assess all stations throughout the network with a view to implementing its strategy at stations where there is a need for modifications that will have an impact on multimodal travel and station access. The Project aims to improve the integration and accessibility of the public transport network for stations and communities across the network, through the provision of multimodal interchanges. This Project will assess a variety of multimodal options at stations including but not limited to the provision of secure bicycle parking and shared mobility services. The Strategy relating to this Project was completed in 2023 and is currently with the NTA for review and approval. Subject to approval and funding the Project will move to the next phase and eventual delivery of the solutions identified.”*

4.4 SB0073 - HSE National Environmental Health Service

1. Summary of Issue Raised

The submission notes that *“the National Environmental Health Service (NEHS) is satisfied that the EIAR provides an adequate description of the proposed project”* and also that *“the NEHS is satisfied that the Non-Technical Summary provides an adequate description of the Proposed Development and the potential impacts on human health.”*

In respect of consultation, the submission notes that *“the National Environmental Health Service (NEHS) emphasises the need for people to have access to a feedback mechanism where feedback including complaints are received and acted upon by a designation person/liaison within the Proposed Development. This feedback mechanism is recommended to be in place during all phases of the Proposed Development but primarily during the construction phase”*.

Response to Issue Raised

The Applicant notes and welcomes the HSE comments in this regard.

In respect of consultation, the Applicant notes that a detailed Construction Environmental Management Plan (CEMP) has been prepared and is provided in Appendix A5.1 of the EIAR that accompanied the Railway Order application. This sets out the key measures to be implemented by the Contractor through the construction phase, so as to avoid, or minimise impacts on the environment, during the construction phase. This CEMP will be further developed by the Contractor, in consultation with relevant authorities, prior to the commencement of construction.

Section 1.10.1 deals with external communication and sets out that a *“Stakeholder Management and Communication Plan (SMCP) will be prepared by the Contractor”* and that *“the Employer will appoint a Public Liaison Officer, or equivalent, who will be consulted in the preparation of the Plan as well as its maintenance and implementation”*.

Section 1.10.1 goes on to state the principal components of the SMCP which includes:

“Details of general construction process/phasing will be communicated to the relevant stakeholders and members of the public prior to implementation to ensure local residents and businesses are fully informed of the nature and duration of construction works; and

Details of a contact name and number for any complaints that may arise during such works”.

It also states that a *“complaints register will be developed as part of the Plan to efficiently record any complaints made. Environmental related complaints will be initially directed to the Site Environmental Manager”* and it includes a template for an environmental complaints register by way of example.

During the operational phase, as with all its operations, the Applicant has a documented policy for the management of complaints and has a Community Liaison Officer who is available to deal with such complaints.

2. Summary of Issue Raised

In respect of Hydrogeology, the submission recommends that *“the mitigation measures described under Section 11.8.1.1 of the full EIAR are adopted as minimum conditions of planning to protect groundwater quality.”*

Response to Issue Raised

The Applicant notes the recommendation of NEHS and is committed to the full implementation of all mitigation measures included in the EIAR.

These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

3. Summary of Issue Raised

In respect of Air Quality and Dust, the submission recommends that *“the dust mitigation and other air quality mitigation measures detailed under Appendix A12.1 of the full EIAR are adopted as minimum conditions of planning. As outlined these measures should be undertaken in parallel with the Construction Environmental Management Plan (CEMP) under Appendix A5.1.*

The NEHS recommends that the measures described under Section 12.6.1.3 for the mitigation of transport emissions during the construction phase are adopted and included in the Construction Environmental Management Plan. The use of low emission vehicles such as Battery Electric Vehicles should be considered as an option to not only reduce emissions of NO_x and particulates but also as a means to reduce green-house gas emissions.”

Response to Issue Raised

The Applicant notes the recommendation of NEHS and is committed to the full implementation of all mitigation measures included in the EIAR. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. In respect of low emission vehicles, the Applicant notes the commitment made in Chapter 12 Air Quality of the EIAR, and in Section 12.6.1.3 that *“Construction vehicles should conform to the current EU emissions standards and where reasonably practicable, their emissions should meet upcoming standards prior to the legal requirement date for the new standard. This will ensure emissions on haul routes are minimised.”* Again, this requirement will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. These recommendations are therefore already incorporated into the scheme and any Railway Order permission.

4. Summary of Issue Raised

In respect of Climate, the submission notes the following:

- 1) *“The NEHS recommends that the mitigation measures described under 13.6.1 and 13.6.2 of the EIAR are adopted as minimum conditions of planning. Additional measures could be adopted to further reduce emissions and support healthy place making. One area to examine is the possibility of using low emission vehicles such as battery electric vehicles. Another area to include is to support sustainable and active travel modes by providing access to other public transport services adjacent to stations*

and to provide secure bike/scooter parking for those preferring to use active modes of transport.”

- 2) *“The use of offsetting as a strategy for reducing green-house gas emissions should be a strategy of last resort. Every effort should be made to reduce emissions at source first.”*
- 3) *“The NEHS recommends that Adaptation measures to address the potential impact of climate change on the Proposed Development during the construction and operational phases are included as part of the planning conditions. Measures to reduce exposure and vulnerability to climate change include addressing severe weather events such as floods, heatwaves, dry spells and windstorms as well as addressing the more slow onset changes climate change can bring in areas such as water availability from recycling and reuse plans, and potential changes that enable vectors of disease (mosquitos and flies for example) to proliferate.”*
- 4) *“The NEHS recommends that the Proposed Development seek to support health gain and protect health. Reference has already been made to supporting sustainable and active travel modes for those accessing rail services. Actions include ensuring safe access for pedestrians (well signposted, segregated, illuminated displaying walk times to various locations), cyclists and others using active travel to rail stations and supporting secure parking. Provision of park and ride facilities. Users of Electric Vehicles may be supported with EV charging points. Adequate shade should be provided to protect users from the harm of UV sunlight as well as shelter from other types of weather.”*

Response to Issue Raised

The Applicant responds to each of these points as follows:

- 1) In respect of the proposed condition that *“the greenhouse gas mitigation measures described under 13.6.1 and 13.6.2 of the EIAR are adopted as minimum conditions of planning”*, the Applicant notes that these measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore necessary in this regard.

In respect of low emission vehicles, the Applicant notes the commitment made in Chapter 12 Air Quality of the EIAR, and in Section 12.6.1.3 that *“Construction vehicles should conform to the current EU emissions standards and where reasonably practicable, their emissions should meet upcoming standards prior to the legal requirement date for the new standard. This will ensure emissions on haul routes are minimised.”* Again, this requirement will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. These recommendations are therefore already incorporated into the scheme and any Railway Order permission.

The Applicant also notes that, as detailed in the EIAR (Appendix A5-1 CEMP, see sub-Appendix A (EIAR Chapter 27 Summary of Mitigation and Monitoring Measures) “a

Mobility Management Plan (MMP) will be implemented for the duration of construction and the measures detailed below and will be further developed by the Contractor, in liaison and with the agreement of the relevant local authorities. The Construction Traffic Management Plan (CTMP) (included in the CEMP in Appendix A5.1 of Volume 4 of this EIAR) references the need for a detailed MMP.

This MMP will manage trips associated with construction staff. The MMP is set out to achieve the following objectives:

- To reduce and discourage the use of the private car as the primary means of travel when accessing the Construction Compounds as far as possible within daytime working hours.*
- Promote the use of sustainable modes of transport such as walking, cycling and public transport when travelling to and from the Construction Compounds.*
- To liaise with the Local Authorities, National Transport Authority and Iarnród Éireann to encourage and facilitate staff active travel take up.*
- To create a unified network of stakeholders to support the constraints outlined within the mitigation measures while accessing the Construction Compounds.*
- To Coordinate with adjacent construction projects in relation to forming a combined and supported Mobility Management Plan”.*

The Applicant considers that this responds to the recommendations of HSE in this regard. Again, the Mobility Management Plan and the measures therein will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

- 2) The Applicant notes Chapter 13 Climate of the EIAR, which sets the mitigation measures with respect to the construction and operational phases in order to reduce its impact on climate related GHG emissions by implementing low-carbon energy options. In that respect, as detailed in Section 13.6, it states that “Iarnród Éireann will actively purchase materials and services with lower embodied/embedded emissions. Where possible the aim is to design out and eliminate potential impacts completely. Where this is not possible impacts should be reduced/substituted to reduce impacts. Finally, if impacts cannot be eliminated by design or reduced/substituted then the IEMA GHG Management Hierarchy final mitigation measure that should be considered is compensation, this includes the use of carbon offsets.”*

The Applicant considers that this responds to the recommendations of HSE. These measures as detailed in the EIAR will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

- 3) The Applicant has considered future climate risk in the development of the design for the proposed DART+ Coastal North Project.*

As detailed above, Chapter 13 Climate of the EIAR, sets out the mitigation measures with respect to the construction and operational phases in respect of climate. The Applicant also notes that a Flood Risk Assessment has been undertaken for this Proposed Development and is included with the Railway Order application. This assessment considers any necessary adaptation measures required to combat future flood risk, including climate change considerations. This is also addressed in Chapter 10 Water of the EIAR.

These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

- 4) In respect of measures associated with active travel and access to the stations, the Applicant notes that these works (save for the proposed upgrades to the Howth Junction & Donaghmede Station which are proposed in direct response to public consultation and are intended to improve passenger experience and to better prepare the station to act as an interchange station) are not included in the DART+ Coastal North Project. As detailed in the EIAR, Chapter 26 Cumulative Effects (Table 26-6 Cumulative Assessment of DART+ Coastal North with Other projects), there are other parallel projects which are looking at these aspects.

As detailed within the above referenced table, the DART Station Enhancement Project at the time of the Railway Order application “*is appointing consultant services to review the future requirements at DART stations. The objective of the Project initially is to produce a study that will recommend how DART stations (current and proposed network) should be enhanced into the future to provide an improved customer experience, whilst also considering the increasing passenger demand capacity challenges that will be introduced in the future. It will outline the most effective method to enhance DART stations into the future considering the provision of increased services under the DART+ Programme and all other ongoing projects/programmes with an aim of making DART stations more attractive to the customer. The early elements of this Project (focussing mainly on capacity issues associated with future passenger numbers will be progressed in 2024, and subject to funding will be progressed thereafter.*”

In the same table in the EIAR, reference is made to the Multimodal Interchange Project, which will “*assess all stations throughout the network with a view to implementing its strategy at stations where there is a need for modifications that will have an impact on multimodal travel and station access. The Project aims to improve the integration and accessibility of the public transport network for stations and communities across the network, through the provision of multimodal interchanges. This Project will assess a variety of multimodal options at stations including but not limited to the provision of secure bicycle parking and shared mobility services. The Strategy relating to this Project was completed in 2023 and is currently with the NTA for review and approval. Subject to approval and funding the Project will move to the next phase and eventual delivery of the solutions identified.*”

It is anticipated that both of these projects would provide an improved passenger experience and greater functionality and connectivity to provide more sustainable transport and thereby reducing carbon footprints. In terms of cumulative effects, it was noted that, if the construction programmes overlap, there are cumulative effects for traffic and transportation. The proposed DART+ Coastal North Project will reduce carbon emissions and in combination with these projects, will assist in meeting Ireland's commitments to decarbonisation.

5. Summary of Issue Raised

In respect of Noise & Vibration, the submission *“recommends that the mitigation measures detailed for Noise and Vibration under section 14.6 of the full EIAR are set as minimum conditions of planning. Particular attention should be paid to the construction areas outside of the existing railway corridor where proximity to Noise and Vibration Sensitive locations may be closer to effect population health.”*

Response to Issue Raised

The Applicant notes the recommendation of NEHS and is committed to the full implementation of all mitigation measures included in the EIAR. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

A detailed Noise & Vibration assessment has been undertaken and is presented in Chapter 14 Noise and Vibration of the EIAR. This has been prepared in accordance with best practice guidance and relevant standards as detailed in Section 14.2 and 14.3 of that chapter. The study area as described in Section 14.3.1 includes a zone within 300 m of new or altered roads or railways, consistent with the Guidelines for the Treatment of Noise and Vibration in National Road Schemes (TII, 2014) and is defined as *“the area where significant noise and vibration impacts due to construction activity may occur.”* The noise and vibration impacts were assessed at the sensitive receptors within this study area. In that respect, the Applicant considers that *“particular attention has been paid to construction areas outside of the existing railway corridor where proximity to Noise and Vibration sensitive locations may be closer to effect population health.”*

6. Summary of Issue Raised

In respect of pest/vector control, the submission recommends that a *“Pest/Vector Control Plan is incorporated into the Design, Construction and Operation of the Proposed Development in the context of Integrated Vector Management to prevent vectors from breeding in the first place to measures that protect population health.”*

Response to Issue Raised

A detailed CEMP has been prepared and is included in Appendix A5.1 of the EIAR which accompanies the Railway Order application. This CEMP will be developed further by the Contractor in consultation with the relevant authorities prior to the commencement of

construction. The said plan will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. The Applicant commits to including a Pest/Vector Control Plan in the CEMP, in advance of construction.

7. Summary of Issue Raised

The submission recommends a number of conditions, should An Bord Pleanála grant the Railway Order for DART+ Coastal North.

Response to Issue Raised

These conditions, together with any response by the Applicant are provided in Table 6 below.

Table 6 - Recommended Conditions (HSE)

Nr.	Recommended Condition	Response to Recommended Condition
1	That the local community including residential, landowners, commercial, and others, have access to a feedback mechanism where feedback including complaints are received and acted upon by a designated person/liaison within the Proposed Development. This feedback mechanism is recommended to be in place during all phases of the Proposed Development but primarily during the construction phase.	The Applicant refers to the response under Point 1) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.
2	That the mitigation measures described under Section 11.8.1.1 of the Hydrogeology chapter of the full EIAR are adopted as minimum conditions of planning to protect groundwater quality.	The Applicant refers to the response under Point 2) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.
3	That the dust mitigation and other air quality mitigation measures detailed under Appendix A12.1 of the full EIAR are adopted as minimum conditions of planning. As outlined these measures should be undertaken in parallel with the Construction Environmental Management Plan (CEMP) under Appendix A5.1.	The Applicant refers to the response under Point 3) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.

4	<p>That the measures described under Section 12.6.1.3 for the mitigation of transport emissions during the construction phase are adopted and included in the Construction Environmental Management Plan (CEMP). The use of low emission vehicles such as Battery Electric Vehicles should be considered as an option to not only reduce emissions of NO₂ and particulates but also as a means to reduce green-house gas emissions.</p>	<p>The Applicant refers to the response under Point 3) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.</p>
5	<p>That the (green-house gas) mitigation measures described under 13.6.1 and 13.6.2 of the EIAR are adopted as minimum conditions of planning. Additional measures could be adopted to further reduce emissions and support healthy place making. One area to examine is the possibility of using low emission vehicles such as battery electric vehicles. Another area to include is to support sustainable and active travel modes by providing access to other public transport services adjacent to stations and to provide secure bike/scooter parking for those preferring to use active modes of transport.</p>	<p>The Applicant refers to the response under Point 4) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.</p>
6	<p>That the use of offsetting as a strategy for reducing green-house gas emissions should be a strategy of last resort. Every effort should be made to reduce emissions at source first.</p>	<p>The Applicant refers to the response under Point 4) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.</p>
7	<p>That Adaptation measures to address the potential impact of climate change on the Proposed Development during the construction and operational phases are included as part of the planning conditions. Measures to reduce exposure and vulnerability to climate change include addressing severe weather events such as floods, heatwaves, dry spells and windstorms as well as addressing the more slow onset changes climate change can bring in areas such as water availability from recycling and reuse plans, and potential changes that enable vectors of disease (mosquitos and flies for example) to proliferate.</p>	<p>The Applicant refers to the response under Point 4) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.</p>

8	<p>That the Proposed Development seek to support health gain and protect health. Reference has already been made to supporting sustainable and active travel modes for those accessing rail services. Actions include ensuring safe access for pedestrians (well signposted, segregated, illuminated displaying walk times to various locations), cyclists and others using active travel to rail stations and supporting secure parking. Provision of park and ride facilities. Users of Electric Vehicles may be supported with EV charging points. Adequate shade should be provided to protect users from the harm of UV sunlight as well as shelter from other types of weather.</p>	<p>The Applicant refers to the response under Point 4) above. These works (save for the proposed upgrades to Howth Junction & Donaghmede Station) are not included in the DART+ Coastal North Project and therefore it is not appropriate to condition the Applicant in that regard.</p>
9	<p>That the mitigation measures detailed for Noise and Vibration under section 14.6 of the full EIAR are set as minimum conditions of planning. Particular attention should be paid to the construction areas outside of the existing railway corridor where proximity to Noise and Vibration Sensitive locations may be closer to effect population health.</p>	<p>The Applicant refers to the response under Point 5) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application. No further condition is therefore required.</p>
10	<p>That a Pest/Vector Control Plan is incorporated into the Design, Construction and Operation of the Proposed Development in the context of Integrated Vector Management to prevent vectors from breeding in the first place to measures that protect population health.</p>	<p>The Applicant refers to the response under Point 6) above. These measures will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.</p>

4.5 SB0075 - Inland Fisheries Ireland (IFI)

1. Summary of Issue Raised

The Inland Fisheries Ireland (IFI) submission recommends that *“a comprehensive and integrated approach for achieving estuary and river protection during construction and operation should be implemented through environmental construction management planning. The disturbance of riparian habitats should be minimised. An undisturbed buffer zone between development areas and riverbanks should be maximised.”*

Response to Issue Raised

The Railway Order application includes full details of the proposed works, including proposals for the protection of estuarine and riverine waters.

The Applicant notes as detailed within Chapter 10 Water of the EIAR, that no in-stream works are proposed as part of the DART+ Coastal North Project.

Chapter 10 Water of the EIAR, assesses the potential effects of the Proposed Development on water, including hydrology, surface water quality and flood risk. The assessment was carried out in accordance with best practice guidance and standards, as set out in Section 10.5 and 10.6 therein. A comprehensive suite of mitigation and monitoring measures were set out in Section 10.9 including best practice construction methods, to mitigate any of the potential impacts identified in Section 10.8. This includes both generic and specific mitigation measures to sets out a number of mitigation measures. With the implementation of these measures, the residual impact on hydrology and flood risk is considered imperceptible, during the construction, operational and decommissioning phases.

A detailed Construction Environmental Management Plan (CEMP) has been prepared for the Proposed Development and is included in Appendix A5.1 of the EIAR. This CEMP will be further developed by the Contractor, in consultation with relevant authorities, prior to the commencement of construction. The CEMP includes a Surface Water Management Plan (SWMP) as sub-Appendix H to the CEMP. It also includes an Incident Response Plan, as sub-Appendix X to the CEMP. Both plans will be further developed with the CEMP prior to the commencement of construction.

As per Section 1.1 of the SWMP, *“the Construction Surface Water Management Plan (“the SWMP”) incorporates information on the control and management measures taken in order to avoid, prevent, or reduce any significant adverse impacts on the surface water environment during the Construction Phase of the DART+ Coastal North Project hereafter referred as the “Proposed Development”.*

Chapter 8 Biodiversity of the EIAR, also considers the potential impact on riparian habitats and includes a number of mitigation measures, see Section 8.9 of that chapter, to avoid or minimise these impacts. This includes implementation of the SWMP, as well as the Incident Response Plan and other specific measures.

In terms of buffer zones, the EIAR includes the following measures:

- *“Settlement tanks, silt traps/bags and bunds will be used where required to remove silt from surface water runoff. Sizing of the tanks will be based on best available guidelines, CIRIA (2006). Any construction work within a 10m buffer zone must be provided with these measures to minimise sediment discharge to a watercourse.*
- *Refuelling of all plant, machinery, and vehicles will be undertaken only in designated areas where leaks and spills are can be contained relatively easily. Spill kits will be made available on all temporary and permanent construction sites. Refuelling areas must be kept at least 50m away from any watercourse, including, but not limited to; estuarine, transitional, and coastal waterbodies”*

The above demonstrates that the Applicant has fully considered the recommendations of IFI in this regard and no further measures are necessary.

2. Summary of Issue Raised

The submission notes that *“to prevent water pollution, before commencing any works, it is strongly advised to ensure that all construction personnel and contractors are made familiar with and adhere to the mitigation measures in any construction phase surface water management plan, construction management and environmental plan, Inland Fisheries guidance on protecting fisheries during construction, construction industry guidance and planning permission conditions pertaining to your site to protect water quality and the wildlife habitat of any watercourses.”*

Response to Issue Raised

The Applicant would refer to the detail provided above in response to Point 1) in this regard.

The Applicant also refers to the CEMP, in Appendix A5-1 which includes details of training and induction that will be required of all employees and subcontractors involved on site, see Section 3.4 of the CEMP. This demonstrates that the Applicant has considered the advice of IFI in this regard and that no further measures are required. The CEMP (and the mitigation measures therein) will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

3. Summary of Issue Raised

The IFI submission notes that *“drainage works should ensure adequate attenuation measures are in place and silt and petrol interceptors, constructed wetland, swales and other nature based solutions should be employed where appropriate to reduce pollutants from the railway and compounds entering watercourses.”*

Response to Issue Raised

Full details of the proposed drainage works are provided in the Railway Order application and accompanying documentation and drawings. The Applicant refers to Chapter 4 Description of the Proposed Development in the proposed EIAR which details the infrastructure to be provided as part of the Project and the design detail, including drainage infrastructures, where SuDS was a key consideration.

Chapter 10 Water, Chapter 8 Biodiversity, the detailed CEMP (and the Surface Water Management Plan and Incident Response Plan therein) all contain details of the mitigation and monitoring measures proposed to ensure that watercourses are protected from pollutants during the construction phase.

Within the SWMP in the CEMP, it is stated (Section 1.3.1 of the SWMP) that *“the development of a Sediment Control Plan (SCP) will be undertaken prior to commencement of construction by the appointed Contractor. This includes the monitoring of suspended solids and turbidity levels ensuring that sediment concentrations are up to standard prior to discharge. Works in Flood Zones A and B should be avoided where possible. For any works in these flood zones, the Contractor will be required to provide appropriate mitigation measures within a method*

statement for the removal of materials to minimise potential sediment discharge into the nearest watercourse.”

Section 1.3.1 of the SWMP also includes the following measures:

- *“Works areas will be kept dry as far as reasonably practicable;*
- *Bunds of non-erodible material will be used adjacent to watercourses to avoid contaminated water entering the watercourse as far as reasonably practicable;*
- *Settlement tanks, silt traps/bags and bunds will be used where required to remove silt from surface water runoff. Sizing of the tanks will be based on best available guidelines such as CIRIA Technical guidance C648: Control of Water Pollution from Linear Construction Projects (CIRIA 2006). Any construction work within a 10m buffer zone must be provided with these measures to minimise sediment discharge to a watercourse;*
- *Weather conditions to be checked by Contractor and coordinated with any planning construction activities in order to minimise surface water runoff from the site.”*

It also notes the following measures in respect of water quality (Section 1.3.1 of the SWMP):

- *“The Contractor will be responsible for ensuring that surface water control measures, such as settlement areas or silt fences, are carried out/monitored daily. Additionally, water bodies crossed by the Proposed Development shall be visually inspected weekly by the Contractor. Water pollution indicators include:*
- *Water colour and transparency changes;*
- *Increase of silt levels in the water;*
- *Oily sheen on the water surface; and*
- *Floating detritus, scums, and foams. In case any contamination is observed, an investigation shall be carried out (depending on the source and nature) in order to prevent any further worsening contamination status, with any incidents being recorded and investigated in more detail to prevent a recurrence.”*

The Applicant considers that these measures address the issue raised by IFI in its submission. The mitigation measures set out in the EIAR and in the CEMP will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

4. Summary of Issue Raised

The submission notes that *“there can be no direct pumping of contaminated water from the works to a watercourse at any time. Any dewatering of ground water during excavation works must be pumped into an attenuation area before being discharged offsite.”*

Response to Issue Raised

The Applicant notes that a detailed Construction Environmental Management Plan (CEMP) has been prepared and is included in Appendix A5-1 of the EIAR and that a Surface Water Management Plan (SWMP) has been prepared and is included in Appendix H of the CEMP. The SWMP includes a suite of mitigation measures to protect surface water quality, including (among others):

- *“Works areas to be kept dry at all times through the use of bunds of non-erodible material adjacent to watercourses to avoid contaminated water entering the watercourse.*
- *Settlement tanks, silt traps/bags and bunds will be used where required to remove silt from surface water runoff. Sizing of the tanks will be based on best available guidelines, CIRIA (2006). Any construction work within a 10m buffer zone must be provided with these measures to minimise sediment discharge to a watercourse;*
- *Refuelling of all plant, machinery, and vehicles will be undertaken only in designated areas where leaks and spills are can be contained relatively easily. Spill kits will be made available on all temporary and permanent construction sites. Refuelling areas must be kept at least 50m away from any watercourse, including, but not limited to; estuarine, transitional, and coastal waterbodies*
- *Good construction management practices as outlined in the CIRIA guidance Control of Water Pollution from Construction Sites – Guidance for consultants and contractors (Masters-Williams et al., 2001) will be employed by the appointed contractor to minimise the risk of transmission of hazardous materials as well as pollution of adjacent watercourses and groundwater. The construction management of the site will take account of these recommendations to minimise as far as possible the risk of soil, groundwater and surface water contamination.”*

The mitigation measures set out in the EIAR and in the CEMP will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

The Applicant has no objection in principle to this condition being attached to any grant of permission by An Bord Pleanála.

5. Summary of Issue Raised

The IFI submission requests that *“surface water outfalls to any watercourse must have detail design and subsequent method statements submitted to IFI for approval.”*

Response to Issue Raised

The Applicant notes this requirement and will continue to engage with IFI throughout in this regard.

6. Summary of Issue Raised

The submission requests that *“any utility diversions that involves crossing of waterbodies should be conducted in a manner that does not allow any deleterious material to discharge to any watercourse. Crossings of watercourses should ideally be by directional drilling and will be subject to an agreed method statement with IFI. Any river or stream manipulation works (bridging, culverting or otherwise) must first be submitted to IFI for consultation and approval. The open season for instream construction works in salmonid river systems runs from 1st July to September 30th each year. The timing constraints do not apply to directional drilling which may take place at any time of year.”*

Response to Issue Raised

The Applicant refers to the response under Point 1) above which notes that, as detailed in the Railway Order application, no in-stream works are proposed as part of DART+ Coastal North.

In respect of any bridging, culverting, etc, the requirements are noted by the Applicant. The Railway Order application acknowledges the need for a Section 50 consent from OPW for the new bridge and culvert extension over the River Mayne. As detailed in the EIAR, no in-stream works are proposed during the construction phase. The Applicant will continue to engage with IFI throughout the further design development phase, in this regard and all relevant details, in accordance with the appropriate legislation, will be submitted to IFI for approval prior to the commencement of works.

The seasonal requirements with regard to instream works are noted, but as per our response under Point 1) above, no instream works are proposed as part of DART+ Coastal North.

7. Summary of Issue Raised

The submission notes that *“it is essential that the receiving foul and storm water infrastructure has adequate capacity to accept predicted volumes from this development with no negative repercussions for quality of treatment, final effluent quality and the quality of receiving waters.”*

Response to Issue Raised

The Applicant notes that it has engaged with Uisce Éireann with respect to any required connections to public water/wastewater infrastructure to ensure that its requirements are met and will continue to engage with this utility throughout. The design of the substations, which

are (for the most part) outside the railway boundary, have included SuDS measures to minimise surface water runoff.

8. Summary of Issue Raised

The submission requests that *“an agreed detailed design must be sought with IFI for the culvert extension and new bridge over the River Mayne. This is a non-salmonid system, however IFI are currently assessing the viability of a salmonid reintroduction programme. However, the Mayne system does contain populations of European Eel and other fish species.”*

Response to Issue Raised

The Railway Order application acknowledges the need for a Section 50 consent from OPW for the new bridge and culvert extension over the River Mayne. As detailed in the EIAR, no in-stream works are proposed during the construction phase. The Applicant will continue to engage with IFI throughout the further design development phase, in this regard.

9. Summary of Issue Raised

The submission recommends that the *“Guidelines on protection of fisheries during construction works in and adjacent to waters (2016)”* be consulted particularly in the vicinity of surface water features.

The submission also notes that *“IFI have also published the following guidelines which should also be referred to during construction. They can be accessed on our website www.fisheriesireland.ie: Revised "Planning for watercourses in the urban environment" which can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats”*.

Response to Issue Raised

The Applicant has had regard to the *Guidelines on protection of fisheries during construction works in and adjacent to waters” (2016)* in the design development and preparation of the EIAR. In particular, these guidelines are referenced in the Surface Water Management Plan (sub-Appendix H of the CEMP) in Appendix A5-1 of the EIAR, as well as in Chapter 10 Water of the EIAR.

The second guidance referenced is noted by the Applicant. There are no in-stream works proposed as part of the DART+ Coastal North Project. Much of the infrastructure associated with the Proposed Development is within the existing railway boundary. Where works are required outside the railway boundary, this relates primarily to new substations, which have been located outside flood risk zones to the extent possible, utility diversions and temporary construction compounds. There are also some works to viaducts (associated with the need to install OHLE along the viaducts) along the route between Malahide and Drogheda. A suite of measures to protect watercourses from significant run-off or sediment/pollutants are set out in the EIAR documents, as detailed in responses to other points herein.

The design of the substations has taken SuDS principles into account and their location has avoided high flood risk zones.

10. Summary of Issue Raised

The submission requests that *“a suitably qualified Ecological Clerk of Works (ECoW) should be appointed to oversee the site set-up and construction of the Proposed Development and the ECoW shall be present on-site during construction works and carry out the water quality monitoring. IFI must be included in an Emergency Response Plan as a notifiable body in the event of water pollution occurring during construction works. Particular attention to activities likely to generate suspended solids and/or other pollutants and the proposals to prevent these pollutants need to be specified.”*

Response to Issue Raised

Chapter 8 Biodiversity of the EIAR sets out the requirement (Section 8.9.1) that: *“A suitably experienced and qualified ecologist (Ecological Clerk of Works (ECoW)) will be employed by the appointed contractor to advise on ecological matters during construction, communicate all findings in a timely manner to the IÉ and statutory authorities, acquire any licences or consents required to conduct the work, and supervise and direct the ecological measures associated with the Proposed Development.”*

This requirement is also included in the CEMP (Appendix A5-1) which lists the ECoW as a key role under Section 3.3 Project Organisation/Duties and Responsibilities and includes the following requirements for the ECoW:

“In order to ensure the successful development and implementation of the CEMP, the Contractor will appoint an independent Ecological Clerk of Works (ECoW). The ECoW must possess training, experience and knowledge appropriate to the role, including:

- *An NFQ Level 8 qualification or equivalent or other acceptable qualification in ecology or environmental biology; and*
- *Demonstrable experience in the protection of European sites The principal functions of the ECoW are:*

To provide ecological supervision of the construction of the Proposed Development and thereby ensure the full and proper implementation of all the mitigation measures relating to biodiversity prescribed in the EIAR and NIS

- *To regularly review the outcome of the specialist hydroacoustic monitoring if being undertaken and, on that basis, make any necessary adjustments to the mitigation; and*
- *To carry out weekly inspections and reporting on the implementation of the Contractor’s Biosecurity Protocol”*

The Incident Response Plan (included in sub-Appendix F of the CEMP) will be further developed by the Contractor prior to construction. This Plan will include all relevant authorities

as notifiable bodies in the event of water pollution occurring during the construction phase. The Applicant will ensure that IFI is included as a notifiable party in this regard.

The mitigation measures set out in the EIAR and in the CEMP will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

11. Summary of Issue Raised

Finally, the submission notes the following: *“It is respectfully highlighted that appropriate environmental protection measures are the responsibility of the developer and contractor involved, and all works are subject to the provision of the Local Government (Water Pollution) Act 1977 (as amended) and the Fisheries (Consolidation) Act 1959 (as amended). Ongoing aquatic ecological monitoring both during construction and operational phases should be implemented.”*

Response to Issue Raised

The Applicant acknowledges this requirement and responsibility. The Applicant has set out robust measures within the EIAR, as detailed therein and in the responses to the points raised herein, to ensure that the Proposed Development can be undertaken without significant adverse impacts on the surrounding environment, including the water environment. The Applicant notes that the mitigation measures set out in the EIAR and in the CEMP will be incorporated into the scheme if approved by An Bord Pleanála, as it is part of the plans and particulars submitted with the Railway Order application.

The Applicant also notes the water quality monitoring programme set out within the EIAR, see Section 10.9.3 therein, which states:

“Water quality monitoring should be undertaken in the surface water bodies located in the proximity of construction works and sensitive watercourses. Monthly samples have been taken as a baseline prior to commencement of the Construction Phase. Sampling should continue from the start of the Construction Phase until at least 12 months post-completion. Additional sampling points can be added if required, determined by the Site Environmental Manager. The results of the water quality monitoring programme will be reviewed by the Site Environmental Manager on an ongoing basis during the Construction Phase. In the event of any noncompliance with regulatory limits for any of the water quality parameters monitored, an investigation will be undertaken to identify the source of this non-compliance and corrective action will be taken where this is deemed to be associated with the Proposed Development.

It is expected that the OPW and EPA will continue to monitor water levels in the 11no. waterbodies listed below in Table 27-6. The Marine Institute also has a tidal gauge at Dublin Port which can be monitored. Sea level rise and freeboard have been assessed and accounted for in the design, however, any unforeseen changes identified in continued monitoring can be used to inform and update the scheme design and considered on a case-by-case basis.”

4.6 SB0117 - National Transport Authority (NTA)

1. Summary of Issue Raised

The submission states that NTA has reviewed the Railway Order application for DART+ Coastal North and recommends that An Bord Pleanála grants consent for the Proposed Development, given the reasons and considerations as set out within its submission, which include:

- DART+ Coastal North (and the wider DART+ Programme) is a specific objective of government, under the Climate Action Plan, the National Development Plan and the Transport Strategy for the GDA 2022-2042.
- The DART+ Coastal North Project aligns with national, regional and local policy, including NIFTI, the NPF, Eastern and Midlands RSES, as well as the Dublin City Development Plan and the Fingal, Meath and Louth County Development Plans.
- Consideration of Proposed Scheme Details – as detailed in the submission, *“the NTA is satisfied that the Railway Order as submitted to the Board has considered the available alternatives, the views expressed during the non-statutory consultations and represents the appropriate approach to serve the existing and future communities along this corridor with the effective high-capacity public transport solution that is required to meet demand in the long-term.”*
- Howth Junction/Donaghmede Station Proposals – the submission notes the significant enhancements to the station environment proposed by DART+ Coastal North, the significant increase in capacity and frequency of service enabled by the Proposed Development. The submission also notes that *“the proposed works maintain the necessary infrastructure to provide direct services between the city centre and Howth and the city centre northwards to Malahide and Drogheda”* while also noting that *“the optimum capacity on both lines can be achieved through the provision of a 10-minute frequency to Howth, Sutton and Bayside, representing a doubling of all-day frequency, and the provision of a 5- minute frequency service on the Northern Line, which is achieved by reconfiguring the Howth branch service to a shuttle type, with interchange at a significantly improved Howth Junction and Donaghmede station”*. Finally in this regard, it notes that *“any future changes to service patterns and timetables will be considered through the annual timetable change process which is developed by Iarnród Éireann and the NTA and subject to public consultation”*.

Finally, in its concluding remarks, the NTA notes the following and trusts that its views will be taken into account in the assessment of the Railway Order application:

“The improvement of rail service frequency and capacity on the Northern Line has been a long-standing objective of transport planning at the regional and metropolitan level. The lack of progress in this regard has been a major constraint to the delivery of more sustainable forms

of development with high-quality public transport services in north Dublin, Louth and East Meath.

Settlements along the Northern Line continue to be identified as major growth centres for the coming years in the Regional Spatial and Economic Strategy, and in the relevant County Development Plans. The Proposed Development is therefore addressing persistent legacy deficits in transport infrastructure and services, and in the integration of land use planning and transport planning in the Eastern and Midlands Region.

For the reasons outlined above, the NTA strongly supports the Proposed Development as critical in meeting Government objectives related to climate change; sustainable development; economic wellbeing, and the fostering of a sustainable transport culture whereby viable and attractive alternatives to the private car are provided. It is therefore recommended that An Bord Pleanála grant planning consent to Coras Iompair Éireann to proceed with DART+ Coastal North.”

Response to Issue Raised

The Applicant notes and welcomes the NTA submission to An Bord Pleanála in respect of the DART+ Coastal North Railway Order application.

4.7 SB0123 - Office of Public Works (OPW) - Flood Projects Management

1. Summary of Issue Raised

The OPW submission notes “*their overall support for the DART+ Coastal North Project and welcome the economic, social and tourism benefits of this major transport infrastructure in Dublin, Meath and Louth.*”

The OPW submission goes on to note that it is making this submission specifically with regards to the estate portfolio and under “*its statutory role and responsibility to ensure the protection and preservation of critical State properties, historic/national monuments, and the continuity of State business throughout the Project.*” It is noted that the OPW has made another submission (Submission SB0124) under its separate remit with regard to flood risk.

Response to Issue Raised

The Applicant notes and welcomes the overall support given by OPW to the Proposed Development. A response has been prepared separately with respect to the OPW submission on flood related issues. For clarity, this response relates to the estate portfolio issues raised within this submission only.

2. Summary of Issue Raised

The submission notes and lists OPW-owned and OPW-leased properties adjacent to the Proposed Development, as well as some other Some OPW-owned and OPW-leased properties within the 250-metre buffer zone of the DART+ Coastal North route. In this respect,

the OPW notes that these properties are listed with reference to Chapter 20 Archaeology and Cultural Heritage of the EIAR.

The submission welcomes the opportunity to present to An Bord Pleanála at an Oral Hearing, should the Board deem it appropriate.

Response to Issue Raised

The Applicant notes that, as detailed in the Railway Order application and in the EIAR in particular, much of the works are confined to within the existing railway corridor, with some infrastructural works requiring the acquisition of third-party land, primarily to accommodate new substations and other OHLE equipment, utility diversions, temporary construction compounds, etc.

No works are proposed to any of the properties noted by OPW. It is acknowledged that these properties lie adjacent to, or within a 250 m buffer zone of, the Proposed Development boundary.

A detailed assessment of the potential effects on archaeology and cultural heritage has been undertaken and is documented as referenced by the OPW in Chapter 20 Archaeology and Cultural Heritage of the EIAR. The study area for this assessment included a 250 m zone either side of the railway line. This assessment concludes that with the implementation of mitigation measures as set out within the chapter, *“All archaeological and cultural heritage issues will be resolved by mitigation during the pre-Construction Phase or Construction Phase, in advance of the Operational Phase, therefore there will be no significant residual effects upon the archaeological and cultural heritage resource.”*

A detailed assessment of the potential effects on architectural heritage has also been undertaken and is documented in Chapter 21 Architectural Heritage of the EIAR. The study area for this assessment, based on best practice guidance (as detailed in Section 21.4.1 of the EIAR) was defined as an area extending 50 m in all directions from the Proposed Development boundary. This assessment concludes that, with the implementation of mitigation measures, there will be a significant residual effect during the construction phase at one location, being Newtown Bridges McGraths Lane (OBB80/OBB80A/OBB80B), which is within the railway boundary at Drogheda. The assessment also concludes that there are no significant negative residual impacts during the Operational Phase of the Proposed Development.

Both chapters have been undertaken in accordance with best practice standards and guidance and the requirements of the EIA Directive.

4.8 SB0124 – Office of Public Works (OPW) - Property Management

1. Summary of Issue Raised

The submission “wishes to express and reiterate its overall support for the DART and Coastal North project”. It notes that there is a separate submission by the OPW (in respect of its estate portfolio), submission reference SB0123.

Response to Issue Raised

The Applicant notes and welcomes the OPW’s support for the Proposed Development. A response to that submission has been made separately. The response hereunder relates to the submission of OPW in respect of its role and responsibility for flood risk.

2. Summary of Issue Raised

The OPW submission notes that it is “responsible for maintenance of the Matt arterial drainage scheme at Balbriggan, which falls under the statutory remit of this office to maintain under the 1945 Arterial Drainage Act”. The submission notes that “development should not interfere with drainage works/flood relief works maintained by this office such as channels, embankments, walls etc” and that “where development occurs in the vicinity of an arterial drainage scheme, continued access is required by the OPW for maintenance”.

The submission also requests that “a 10-metre-wide buffer measured from the top edge of the bank of the Matt arterial drainage system be in place to permit access for plant and maintenance. This strip should not be fenced, paved, or landscaped in a manner that would prevent access by plant machinery”.

Response to Issue Raised

In the first instance, the Applicant notes, as set out in Chapter 10 Water of the EIAR, that no in-stream works are proposed as part of the DART+ Coastal North Project.

It notes the location of works in the vicinity of the Matt Arterial Drainage Scheme, which includes the proposed OHLE works at Balbriggan Viaduct and the associated temporary construction compound. Full details of the proposed works are provided in the Railway Order application and accompanying documentation. The works to the viaduct comprise modifications to the viaduct to accommodate the installation of OHLE as part of the electrification of the railway between Malahide and Drogheda. As detailed in Chapter 4 Description of the Proposed Development in the EIAR, “the proposed solution involves attaching the OHLE posts to the pedestrian walkway outside the existing railway fence line. This requires the pedestrian walkway to be locally widened to provide adequate passage around the OHLE masts at the location of Piers 3 and 8. It is proposed to replace the existing pedestrian walkway spans at these locations with a new precast concrete section, similar to the existing (see Image 4-52).”

A temporary compound is proposed for the duration of the construction works in this area, within the car park adjacent to the viaduct. The construction strategy for these works is detailed in Chapter 5 Construction Strategy of the EIAR section 5.6.10. In respect of continued access, buffer zones, etc, the Applicant will continue to engage with OPW to ensure that any such requirements are accommodated throughout.

It is clear from the documentation provided in the Railway Order application that the development will not interfere with drainage works/flood relief works maintained by OPW. The temporary compound is restricted to the existing car park area and does not extend beyond this. The Applicant will continue to engage with OPW to agree any access requirements which may be needed to the drainage scheme, during the construction phase of the DART+ Coastal North Project.

The Applicant notes the detailed assessment of the potential for effects on hydrology and flood risk from the Proposed Development as presented in Chapter 10 Water of the EIAR. As detailed in Table 10-10 (Construction Impact Risk Assessment for Surface Waters) in the EIAR, in respect of the Bracken (Matt) river, it is noted that *“the existing rail line crosses the Bracken (Matt). Works in this area are limited to the provision of OHLE and associated works required for electrification. Additionally, works will be carried out on the Balbriggan Viaduct. Works will be carried out on piers adjacent to the watercourse”*. It is further noted that *“surface water control measures and best practice construction methods are included in the design”* and as a result, the predicted effect post-mitigation is noted as imperceptible.

3. Summary of Issue Raised

The OPW submission notes various consents which may apply to the Proposed Development under the Arterial Drainage Act, 1945, including Section 9, Section 47 and Section 50 of this Act and notes that ‘by law, the consent of the Commissioners of Public Works in Ireland is required for certain agencies proposing to carry out construction/alteration works on bridges and culverts.

Response to Issue Raised

The Applicant acknowledges and understands the requirements of the Arterial Drainage Act, 1945 and the consents which are required under the Act, particularly in respect of the proposed DART+ Coastal North Project.

It is acknowledged in the EIAR and in the site-specific flood risk assessment that a Section 50 consent for the proposed single arch bridge at Clongriffin will be required from the OPW. This consent will be sought at the detailed design stage of the Project, but the requirements of such a consent have been considered in developing the reference design for the bridge, which is included in the Railway Order application. Any other such consents required for the scheme will be sought as appropriate from the OPW prior to construction.

4. Summary of Issue Raised

The submission notes that as part of the Government's National Development Plan to 2030, €1.3bn has been committed to the development of flood relief schemes (FRS) and measures across Ireland. Drogheda FRS is currently at Development and Preliminary Design (Stage 1) in the Project lifecycle. Further information is available at: www.droghedabaltravfrs.ie.

Response to Issue Raised

The Applicant is aware of the proposed Drogheda Flood Relief Scheme (FRS). Works in this area include works at Drogheda MacBride Station and surrounds as detailed in Chapter 4 Description of the Proposed Development of the EIAR and summarised below:

- Replacement of OBB80/80A/80B Railway Terrace Bridge (triple span)
- Reconstruction of UBK01 Dublin Road Bridge
- Reconstruction of OBB81 Drogheda Station footbridge
- Construction of Platform 4 (on Drogheda Freight Sidings) and associated trackwork (Drogheda Turnback)
- Installation of Drogheda Substation
- Work on Light Maintenance Roads and Under Frame Cleaning (UFC) facility at Drogheda Depot
- Works on Stabling Roads 7a and 7b
- Works on Northern Headshunt
- Overhead Line Equipment (OHLE) and Signalling, Electrification & Telecoms (SET) line wide works and utility diversions.

A site-specific flood risk assessment (FRA) has been prepared for the DART+ Coastal North Project and is included with the Railway Order application. This FRA has been prepared in accordance with the OPW and DoEHLG Planning System and Flood Risk Management Guidelines, 2009 and Circular PL 2/2014. All works proposed in and around Drogheda MacBride Station, as detailed above, are at ground levels well above existing and anticipated flood levels (c. 29 to 33 m OD) and are therefore at low risk of fluvial, pluvial and tidal flooding.

While the extents of the proposed DART+ Coastal North Project are within the Drogheda Baltray Scheme Area, as depicted on the study area shown on www.droghedabaltravfrs.ie, it does not appear that any proposed hard defences are identified within the extents of the DART+ Coastal North Project area. It is noted that this scheme is still at design stage and no consent application has been submitted to date. The Applicant will continue to engage with OPW throughout, to ensure that any overlaps both temporally or spatially can be appropriately managed.

As detailed in Chapter 10 of the EIAR, Table 10-10 in particular, *"the existing rail line crosses the Boyne River (on the viaduct). Works in this area will be limited to the provision of OHLE and associated works required for electrification. No additional works are required to the existing culvert crossing or the bridges in the area"*. It is further noted that while *"activities in close proximity to tracks, stations and link bridges could potential increase surface water runoff*

and impact on water quality, this can be managed through best practice measures, as detailed in Section 10.9 of the EIAR”.

4.9 SB0168 - Transport Infrastructure Ireland (TII)

1. Summary of Issue Raised

The TII submission notes that its observations seek to address the safety, capacity and strategic function of the national road network and existing Luas in accordance with TII’s statutory functions and the provision of official policy. It also notes that future Luas, Metro and BusConnects alignments are a matter for the NTA.

Response to Issue Raised

The function of TII in responding to this submission is noted by the Applicant and we have provided the information needed to address the relevant points raised in the submission in this response.

2. Summary of Issue Raised

The submission references the National Development Plan 2021-2030, Eastern and Midlands RSES, the GDA Transport Strategy 2022-2042 and the Dublin City Development Plan 2022-2028 in respect of the requirement to protect the existing national road network, and particularly Dublin Tunnel.

The submission notes that *“TII, as the national roads authority sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of Proposed Development location, scale or typology. The Dublin Tunnel due to its character and nature is subject to very specific and specialised tunnel management requirements as detailed in the TII “Guidance Notes for Developers The assessment of surface and sub-surface developments in the vicinity of the Dublin Port Tunnel” which is available at <https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Port Tunnel Guidance Notes for Developers.pdf>.*

It is critical to the safe and efficient operation of the national road network and the Dublin Tunnel during and after the proposed works that any potential impacts of the proposed works and electrified railway lines are adequately mitigated in accordance with TII “Guidance Notes for Developers The assessment of surface and sub-surface developments in the vicinity of the Dublin Port Tunnel” requirements as part of the Railway Order.”

Of relevance in this respect is the existing train line and depot in Fairview Park and the associated construction compounds and works external to Fairview Depot Maintenance Building, as outlined in Book 1 Works Plans. TII is concerned that the submitted application does not include appropriate identification and treatment of the Dublin Tunnel below proposed works area, nor the undertaking of an assessment in accordance with the requirements of Policy SMT31 of the Dublin City Development Plan 2022-2028.

Response to Issue Raised

The Applicant acknowledges the roles and responsibilities of TII in this regard and the requirement to assess the potential for impacts on the Dublin Port Tunnel from the Proposed Development. In particular, the Applicant notes Policy SMT31 of the Dublin City Development Plan 2022-2028, which states that it is the policy of Dublin City Council:

1. Transport Tunnels

- (i) To require the submission of appropriate development assessments for all development proposals located in the vicinity of Dublin Tunnel, the requirements of which are set out in Appendix 5.
- (ii) To require consultation with Iarnród Éireann/Irish Rail in relation to heavy rail for any proposed public transport tunnel.

Appendix 5 of the Dublin City Development Plan 2022-2028 includes the technical requirements for Dublin Tunnel (see Section 9.1 therein) and references the *Guidance Notes for Developers for the Assessment of Surface and Sub-surface Developments in the Vicinity of the Dublin Port Tunnel* ([https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Port Tunnel Guidance Notes for Developers.pdf](https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Port_Tunnel_Guidance_Notes_for_Developers.pdf)).

2. Proposed Works in the vicinity of the Dublin Port Tunnel

In response to the issues raised, it is important to recap the extent of infrastructure and the associated construction activities that are proposed in and around Fairview Depot.

As detailed in the Railway Order application (see in particular the First Schedule, Sheet No. 1 Clontarf Road Station and Surrounds and Book 1 Railway Works Plans - Works Plan 01), the nearest permanent works to the Dublin Port Tunnel (DPT) are those detailed under 1.03 within Sheet No.1, being: *“Minor works external to Fairview Depot Maintenance Building including new track pans for train cleaning, walkways and low-level lighting.”*

In terms of temporary works required during the construction phase, the Applicant notes, as per the First Schedule, Sheet No.1 Clontarf Road Station and Surrounds, and Works Plan 01, that there are two construction compounds proposed in the vicinity of the DPT, being as follows:

- *“1.01 - Establish a temporary construction compound (CC-2650) to facilitate the construction of minor upgrade works to Fairview Depot Sidings. The compound will be located on existing CIE lands. Works will include fencing / hoarding and may also include site offices, welfare facilities, storage facilities and workshops as well as storage of certain construction plant and equipment required to carry out the works.*
- *1.02 - Establish a temporary construction compound (CC-2700) to facilitate the construction of minor upgrade works to Fairview Depot Sidings. The compound will be located on existing CIE lands. Works will include fencing / hoarding and may also include*

site offices, welfare facilities, storage facilities and workshops as well as storage of certain construction plant and equipment required to carry out the works.”

The location of these compounds is shown in the Works Plans (Work Plan 01) in the Railway Order application, an excerpt of which is provided below. The Dublin Port Tunnel is shown traversing the site at approx. chainage 2+620 on the work plan excerpt below. It is clear that one of the temporary compounds, CC-2650 (shown on extract as 1.01), slightly overlaps the DPT in this location. No excavation works are proposed for either compound in this location, as the compounds are located on an existing surfaced car park area, see below:

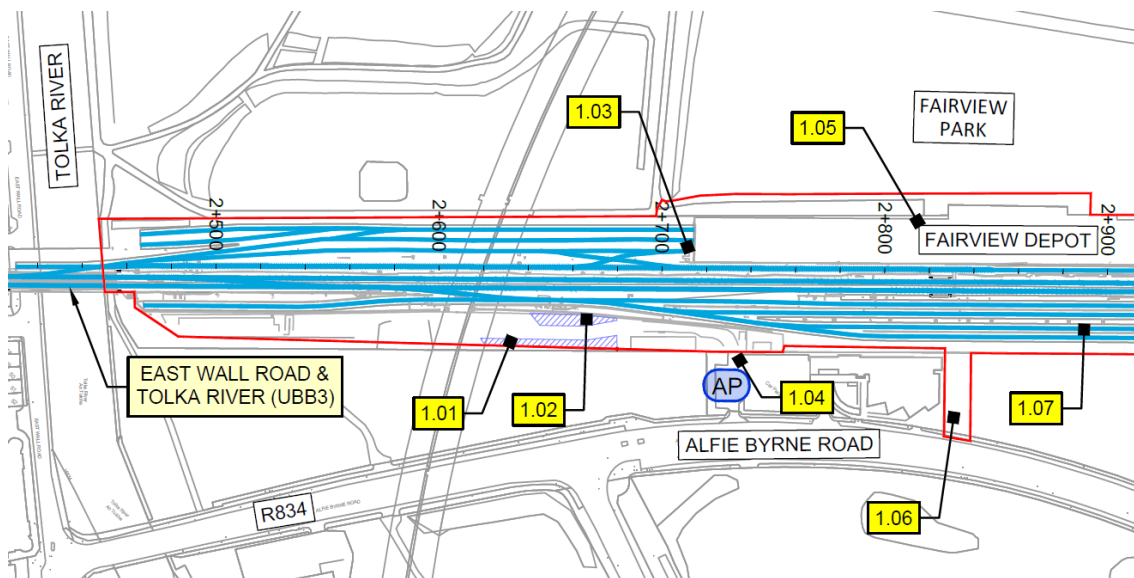


Figure 10 – Excerpt from Railway Order Application Work Plan 01

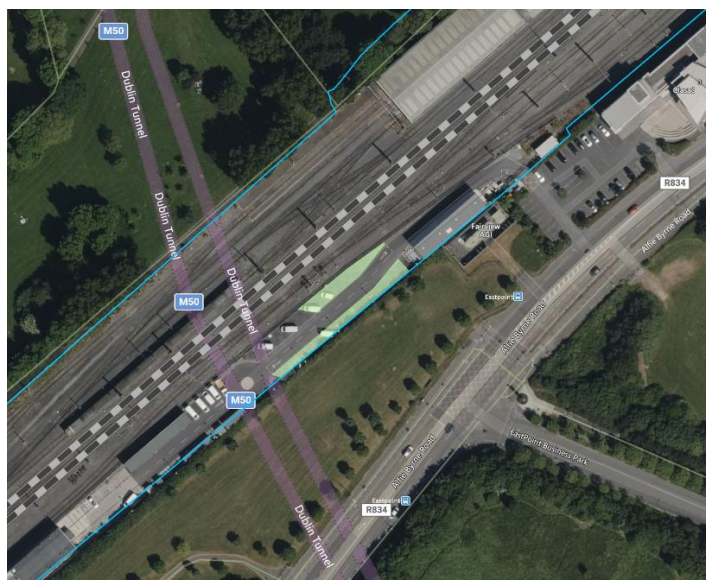


Figure 11 - Excerpt from Railway Order Application Work Plan 01

3. Requirements for an Assessment

As per the Guidance Notes for Developers for the Assessment of Surface and Sub-surface Developments in the Vicinity of the Dublin Port Tunnel

(https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Port_Tunnel_Guidance_Notes_for_Developers.pdf), Section 2, “the NRA will employ the following diagrams to decide on the initial requirement for an assessment by the developer”:

2.1 Location

The NRA will employ the following diagrams to decide on the **initial** requirement for an assessment by the developer:

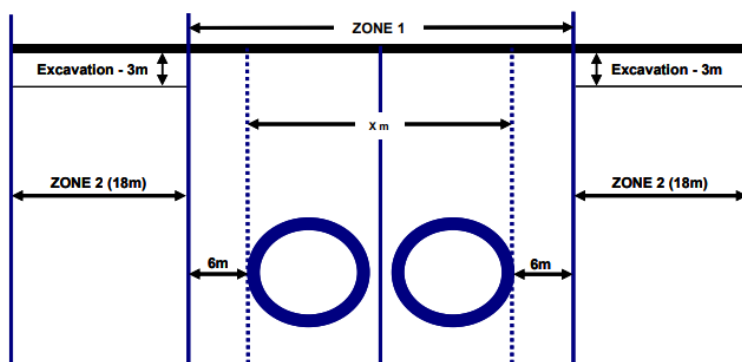


Figure 1: Bored Tunnel – Areas A&B ¹

Not to scale – Depth of Tunnel varies

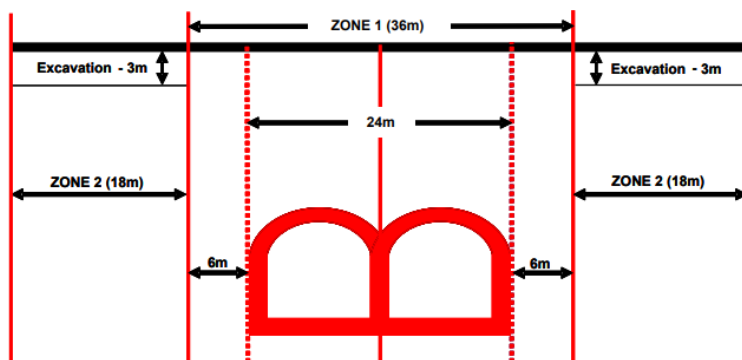


Figure 2: Cut & Cover Tunnel – Area C ¹

Not to scale – Depth of Tunnel varies

Figure 12 – Excerpt from Dublin City Council’s Guidance Notes for Developers for the Assessment of Surface and Sub-surface Developments in the Vicinity of the Dublin Port Tunnel – Figure 1 and Figure 2

Looking at the works proposed in this area, the Applicant can confirm that the permanent works are located 36 m from the southbound tunnel and are therefore outside both Zone 1 and Zone 2 (i.e. outside the area for which an assessment is required). Notwithstanding, the Applicant can also confirm that while there will be some minor excavations required for these works, these excavations will not exceed 3 m in depth (of relevance with regard to the guidance noted above). No piling or ground anchors are required.

Regarding the temporary compounds, it is noted that CC-2650 overlaps Zone 2 and slightly extends into Zone 1. The other compound is outside of both Zone 1 and 2.

No excavations are proposed within these compounds, which are located on existing IE hardstanding areas. The Applicant notes that as per the guidance, a surcharge loading limit of 22.5 kN/m² is required as set out under the assessment criteria of the *Guidance Notes for Developers for the Assessment of Surface and Sub-surface Developments in the Vicinity of the Dublin Port Tunnel*. In this regard, to further clarify and reassure TII, the Applicant has no objection in principle to a condition (should An Bord Pleanála consider it appropriate) as set out below, being attached to the Railway Order, if granted:

With regard to Construction Compound CC-2650, referenced 1-01 as per the Works Plans, the Applicant confirms that all surcharge limits will be complied with, as defined in the *Guidance Notes for Developers for the Assessment of Surface and Sub-surface Developments in the Vicinity of the Dublin Port Tunnel* ([https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Port Tunnel Guidance Notes for Developers.pdf](https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Port_Tunnel_Guidance_Notes_for_Developers.pdf)).

4. Summary of Issue Raised

The submission notes that “*the proposed Construction Environmental Management Plan at Appendix A5.1 of the submitted EIAR presents the approach and application of environmental management and mitigation for the construction phase and Chapter 27 of the submitted EIAR which is the schedule of mitigation and monitoring measures do not appear to include details for the mitigation of potential impact on the Dublin Tunnel. This is a concern.*”

Response to Issue Raised

The Applicant in response would reference the response under Point 1 above.

5. Summary of Issue Raised

The submission notes that considering the points raised under 2) and 3) above, TII recommends the following conditions are applied in the event of an approval by the Board of the Proposed Development, in the interests of the protection of the safety, capacity and efficiency of the national road network:

- Prior to commencement of development, the final Construction Environmental Management Plan (CEMP) shall be submitted for the written agreement of the planning authorities subject to the written agreement of TII which shall include a Development Assessment for the Dublin Tunnel prepared in consultation with TII and identify appropriate mitigation and monitoring for the national road network
- Prior to commencement of development, the Construction Traffic Management Plan including access to services, shall be submitted for the written agreement of the planning authority subject to the written agreement of TII. The Construction Traffic Management Plan shall:

- demonstrate consultation with the Motorway Maintenance and Renewals Contract Network A and M3 PPP Contractors. via TII and the relevant road authorities, and
- include detailed information on traffic management, including signage (static and VMS) to ensure the strategic function of the national road network is protected.

Response to Issue Raised

The Applicant considers that it has adequately addressed the issues raised in respect of the Proposed Development and potential impacts on Dublin Port Tunnel herein and that the condition proposed by the Applicant addresses any concerns of TII in this respect.

In respect of the Construction Traffic Management Plan, the Applicant notes that a detailed Construction Traffic Management Plan has been prepared and is included as sub-Appendix G of the Construction Environmental Management Plan (CEMP) in Appendix A5-1 of the EIAR. This Plan will be further developed by the Contractor prior to construction in consultation with the relevant authorities. The said Plan will also be incorporated into the Railway Order if granted.

4.10 SB0169 - Uisce Éireann (UE)

1. Summary of Issue Raised

The Uisce Éireann submission notes that *“it is imperative that Uisce Éireann’s infrastructure, both existing and planned, is protected and future proofed to ensure continued provision of critical services’.* It also notes that *‘the Applicant, Iarnród Éireann (Irish Rail), has engaged with Uisce Éireann Diversion’s section to assess a number of proposed interactions with Uisce Éireann infrastructure. The focus of this engagement is to consider whether diversions/build overs and build near to Uisce Éireann assets are required to facilitate this Project.’*

Response to Issue Raised

The Applicant notes the requirements to protect and future proof Uisce Éireann’s infrastructure, both existing and planned and has engaged with Uisce Éireann in the development of the design of the DART+ Coastal North Project to ensure that this is fully considered in respect of proposed diversions/build overs and build near to Uisce Éireann assets.

2. Summary of Issue Raised

The submission notes a list of potential diversions/build overs and build near Uisce Éireann assets (noting this may not be an exhaustive list) and notes that *“any additional diversions that may be required, in excess of those listed below, should be agreed with Uisce Éireann at the earliest possible stage, e.g. prior to the commencement of works.”*

The submission further notes that *“designs for all diversions are required to be agreed with Uisce Éireann at the Detailed Design stage of the Project, and in all instances prior to works commencing near Uisce Éireann assets.”*

It also notes in this regard that there is potential that works are required to facilitate the diversion of Uisce Éireann assets on third party lands. Easements to allow Uisce Éireann access to assets must be in place before diversion agreements can be finalised.

Response to Issue Raised

The Applicant notes these requirements. The Applicant consulted with Uisce Éireann throughout the design development and agreed in principle any required diversions/build overs and build near Uisce Éireann assets. The Applicant will continue to engage with Uisce Éireann throughout the development of the DART+ Coastal North Project.

3. Summary of Issue Raised

In respect of connections to public water and wastewater infrastructure, the submission notes that new connections to public wastewater infrastructure are required (as detailed in the Railway Order application) for three substations at North Skerries, Gormanston and Bettystown and notes that *“Iarnród Éireann is required to enter into a connection agreement(s) for these connections prior to the commencement of development.”*

Response to Issue Raised

The Applicant will continue to engage with Uisce Éireann throughout the pre-construction phase of the Project (should the Railway Order be granted) and will ensure that all necessary connection agreement(s) are in place prior to the commencement of development.

4. Summary of Issue Raised

In respect of drinking water source protection, the submission notes *“the linear works occurring within a length of existing track in close proximity to Uisce Éireann's Barnageeragh water abstraction point.”*

The development shall not impact any Drinking Water Source and/or waters used for the abstraction of drinking water nor cause any deterioration in quality during the construction and operational phase of the Proposed Development.”

Response to Issue Raised

The Applicant notes the submission of Uisce Éireann in this regard. The works proposed in this general area include some minor utility diversions as well as parapet modification works to a bridge in the vicinity. A temporary construction compound will be required to enable construction of these works.

A detailed assessment of the potential effects of the Proposed Development on water (including surface water) and hydrogeology (including groundwater) has undertaken and is presented in Chapter 10 Water and Chapter 11 Hydrogeology of the EIAR.

A suite of mitigation measures has been proposed in both chapters to ensure that appropriate protection of surface and groundwaters is provided during both the construction and operational phases of the development.

Section 10.10.1 of the EIAR, concludes in respect of water quality that, *“during the Construction and Operational Phases the Project drainage design, mitigation measures and infrastructure will limit the risk to watercourses and the hydrological environment from flooding and runoff contamination. Water quality samples were collected from 11no. locations across the study area and documented in this study. These results will, together with the EPA monitored data, be used as a baseline to ensure any negative residual impact on sensitive receptors is mitigated.”*

The proposed construction phase measures are also embedded in the Construction Environmental Management Plan (CEMP) which has been prepared and included in Appendix A5.1 of the EIAR. This includes a Surface Water Management Plan (SWMP) as sub-appendix H to this document. The CEMP will be further developed by the Contractor, in consultation with all relevant authorities, prior to the commencement of construction.

The Applicant will, as part of the further development of the CEMP, ensure that it engages further with Uisce Éireann to ensure that there will be no negative impact to any of Uisce Éireann’s drinking water sources and/or abstractions which may be in proximity to the development.

5. Summary of Issue Raised

The Uisce Éireann submission requests a number of conditions to be included in any grant of permission for the DART+ Coastal North Project, as follows:

- *“The Diversion/Build Over/Build Near agreements between Uisce Éireann and the Applicant must be executed prior to any works commencing to/near the Uisce Éireann infrastructure.*
- *Any diversion of Uisce Éireann infrastructure on third party lands will require easements to benefit Uisce Éireann to be put in place.*
- *Any additional proposals by the Applicant to build over or divert existing water or wastewater services shall be submitted to Uisce Éireann for written approval, prior to the commencement of development.*
- *The Applicant shall enter into a connection agreement(s) with Uisce Éireann prior to the commencement of the development and adhere to the standards and conditions set out in that agreement.*

- *The Applicant shall ensure that there will be no negative impact to any of Uisce Éireann's drinking water sources and/or abstractions which may be in proximity to the development during construction and/or operational phases of the development.*

Reason: To protect existing and proposed public water and wastewater infrastructure."

Response to Issue Raised

The Applicant confirms that, should An Bord Pleanála grant the Railway Order for the DART+ Coastal North Project, it has no objection to the above conditions being attached to the grant of permission.

5. RESPONSE TO LANDOWNERS REFERENCED IN THE CPO ON THE PROPOSED SCHEME

This section of the report contains responses relevant to submissions received from owners or representatives of owners of lands lying within the red line boundary of DART+ Coastal North (i.e. those included in the Railway Order application). Submissions from other interested parties such as the public are addressed in Section 6 of this report.

5.1 Zone A

There were no submissions received from landowners in Zone A.

5.2 Zone B

5.2.1 SB0041 – Des & Sharon Stone

Submission Location – Malahide Marina Village

1. Summary of Issue Raised

The submission claims that a negative impact on visual amenity and views from properties will result from the proposed DART+ Coastal North interventions to the rear of properties along the Malahide Marina Village interface with the Malahide Causeway where it is proposed to construct a new turnback facility to enable the proposed increases in DART frequency and capacity on the Northern Line.

The concerns raised cite the intention for the Project to develop elements including the construction of additional lengths of track, a permanent raised walkway including associated handrails and lighting, as well as the future presence of stationary trains as impacting factors on visual amenity in the locality.

Response to Issue Raised

Please refer to Section 2.3.3.1 where these issues are addressed.

2. Summary of Issue Raised

The submission raises concern with the impacts resulting from the construction period for the new Malahide turnback facility as well as the presence of stationary trains at this location when the Project is operational. Concerns are raised in relation to the proposed increase in frequency of service and speed limits that will be applicable during the operational phase of DART+ Coastal North. It is stated in the submission that the proposals “will make our only outside space unusable and will dramatically affect the property value of our homes”

Response to Issue Raised

Please refer to Section 2.3.3 where these issues are addressed. In respect of speed limits, the Applicant notes that the existing linespeed is 90 mph (145 kph). The proposed linespeed is reduced to 70 mph (110 kph), while the speed on the new turnback track will be 25 mph (40 kph). It is also very important to note that the new fleet will be electric, therefore quieter than the current diesel fleet.

Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

3. Summary of Issue Raised

A number of Health and Safety concerns, primarily related to noise & vibration impacts during the construction phase are raised in the submission.

It is stated that elderly residents in Malahide Marina Village, particularly those living in close proximity to the existing railway, those living at ground level or those requiring carers are noted as being at particular risk of having a detrimental impact imposed on them.

The submission suggests that the noise and vibration associated with the construction works, during both daytime and nighttime works, will impact on residents' ability to work effectively at home.

Response to Issue Raised

Please refer to Section 2.3.3.2 where these issues are addressed.

4. Summary of Issue Raised

The submission notes the following concerns in relation to communication and engagement:

- Refusal of request, by Irish Rail, for in-person/online consultation with residents of Malahide Marina Village in January 2024.
- No Digital Renderings Provided during consultation (Residents were not shown how the new rails would look, causing uncertainty).
- Concerns raised over how communication of error within Railway Order documentation was communicated in September 2024.

- General lack of notification related to ongoing rail works (Irish Rail placed track sections without informing residents, causing unexpected visual obstructions (October 2024)).

Response to Issue Raised

The Applicant has worked hard to communicate widely and clearly with the general public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route throughout the design development.

A number of meetings have been held with residents of Malahide Marina Village at various points in the Project development to ensure that the Project proposals were clearly understood. Including, via MS Teams:

- 2023.04.18_Malahide Marina Limited
- 2023.04.19_Malahide Marina Village Board of Management
- 2023.06.23_Malahide Marina Village Residents (Inc Minister O'Brien)
- 2024.01.16_Malahide Marina Village Residents

These meetings were supplemented by letter and email correspondences with a view to the Project team gaining a clear understanding of the concerns of the Malahide Marina Village residents and to answering questions posed by the residents.

1. Format of communications (online / in-person)

As the range of items for discussion in relation to the proposed Malahide Turnback are very complex in nature and involve a wide range of specialists from a wide range of localities, a decision was taken to hold consultation with the residents via MS Teams to ensure that as wide a range of specialists would be available to contribute to the discussions as possible. The holding of these meetings via MS Teams was also intended to allow for as many residents as possible to join the discussions, noting that not all owners of properties within Malahide Marina Village reside in the area.

In addition to the MS Teams discussions that were held with residents, a public consultation event was held on 23 May 2023, in person, in St Sylvesters GAA club in Malahide, as part of Public Consultation No.2 where the Project team were available to discuss the Project and to take feedback.

2. Digital Renderings / Photomontages

The Applicant acknowledges that the range of visualisations of what the proposals of DART+ Coastal North would entail were somewhat limited during discussions with the Residents of Malahide Marina Village. This limitation at the time was primarily due to these photomontages being works in progress at the time of the engagement with the residents of Malahide Marina Village.

A range of photomontages have been developed and included in the Railway Order application, in Figures 15.3.7.1 to Figure 15.3.16.2 in Volume 3B of the EIAR. Further to discussions between the Project team and the residents of Malahide Marina Village the locations of the photomontages were reviewed and updated to ensure appropriateness to support the application.

3. Communication of error within Railway Order documentation in September 2024

Newspaper notices were published on 11th September 2024, advising of an error having been identified with the pre-application consultation file submitted with the Railway Order application to An Bord Pleanála on 12th July 2024. The notice noted that “*in compliance with a request by An Bord Pleanála, CIE has submitted a full and complete version of the pre-application consultation file to an Bord Pleanála and has made this available at the public display locations as listed*”. The notice also made reference to an extension of the consultation period in light of this error. Notice that a full copy of the full and complete pre-application consultation file, along with the original draft Railway Order and documentation accompanying the application, may be viewed at: www.dartcoastalnorthrailwayorder.ie from 09th September, 2024”.

When queried by email by this same individual at the time of the extension of the public consultation period, the Project team responded by directing the submitter to the Project Railway Order website, as per the newspaper notification, where an additional folder containing the relevant pre-application information had been created. It was assumed, given that no further query was submitted, that this provided the information needed. It is regrettable if this was not the case.

4. General lack of notification related to ongoing rail works

Where IÉ is carrying out works of a nature where the potential for neighbouring communities to be impacted, every effort is made to ensure that prior notification is provided to those affected.

5. Summary of Issue Raised

The submission claims that Irish Rail's claim of minimal impact on the area surrounding the Malahide Turnback is disputed by residents.

Response to Issue Raised

The Applicant acknowledges the views of the submission and understands the concerns raised in the submission and by residents at a variety of times through the design development.

However, the Applicant notes that a comprehensive assessment of the potential effects of the Proposed Development has been undertaken and is presented in the EIAR which accompanied the draft Railway Order application. This assessment was carried out in accordance with the relevant EU and national legislation and best practice guidance. A suite of mitigation measures has been identified to ensure that environmental impacts are

minimised through the construction period. These are all documented in the individual chapters of the EIAR and in Chapter 27 Summary of Mitigation and Monitoring Measures.

A detailed Construction Environmental Management Plan (CEMP) has also been prepared and is included in Appendix A5-1 of the EIAR. This details how the construction of the Project will be managed throughout construction to minimise environmental impacts. This Plan will be further developed by the Contractor prior to construction in consultation with the relevant authorities.

6. Summary of Issue Raised

The submission notes that residents believe that the Central Turnback south of Donabate (Option 5A) should have been considered viable but was not shortlisted.

The submission notes a disagreement with the reasons given by Irish Rail (IR) for disregarding Option 5A, such as train users' disappointment and land zoning for residential housing.

Response to Issue Raised

Please see the response provided under Section 2.3.3.5.

7. Summary of Issue Raised

Concerns are raised in the submission in relation to previous changes to timetables to accommodate extra trains between Belfast and Drogheda which resulted in plans being abandoned, as an example of how certain plans can look good on paper but in practice can be a disaster. This example caused major delays, suggesting that practical implementation of plans can differ from theoretical plans.

Response to Issue Raised

The modelling that has been completed as part of DART+ Coastal North is based on industry best practice and the Applicant has no reason to doubt that the design option being presented within the Railway Order for DART+ Coastal North can deliver the requirements of TSS1C.

Following completion of the Project, there will be different phases of timetable development that will be gradually introduced as the passenger demand grows towards the maximum level of service. The operational detail behind each phase of timetable development has not been worked through at this early stage in the Project planning and development. Any substantial timetable change in the future will go through a Public Consultation process of its own organised by the National Transport Authority (NTA) known as the Timetable Customer Consultation Process.

While this concern is understood, the Applicant would note that the DART+ Coastal North Project has been planned over a number of years, with a robust business case approved by government, a detailed assessment of its effects on the environment and full details of the

proposals included within the Railway Order application, its accompanying drawings, EIAR, NIS and associated documentation.

Refer to Section 2.2.20 for additional information regarding previous timetable issues.

5.2.2 SB0088 – Karen Brown

Submission Location – Malahide Marina Village, Malahide.

1. Summary of Issue Raised

The submission raises concern with regard to negative impact on visual amenity and scenic views of Malahide Estuary from the Malahide Marina Village properties, citing the proposed construction of a raised walkway, handrail, and lighting potentially affecting visual amenity.

The submission notes that the impact on visual amenity also raises the potential for decrease in property values.

The submission raises concerns over the impact of stationary trains on visual amenity during driver changeovers.

Response to Issue Raised

Please see the response provided under Section 2.3.3 herein.

2. Summary of Issue Raised

The submission raises concerns relating to light pollution and its effects on wildlife and ecosystems in Malahide Estuary SAC.

Response to Issue Raised

Please see the response provided under Section 2.3.3 herein.

3. Summary of Issue Raised

The submission raises concern with regards to noise and vibration resulting from the works required to modify OHLE and signalling systems.

Concerns are raised over the potential negative impact that the DART+ Coastal North Project may have on quality of life for residents, especially the elderly and those working from home during the construction period.

Response to Issue Raised

Please see the response provided under Section 2.3.3.2 herein.

4. Summary of Issue Raised

The submission raises concern that the construction staging area (Compound) will affect access to the Malahide Water Treatment Plant and will result in increased commercial vehicles and traffic congestion within Marina Village.

Response to Issue Raised

Please see the response provided under Section 2.3.3.3 herein.

5. Summary of Issue Raised

The submission raises concern with regards to the impacts of construction traffic on the wider Malahide area. The main route for construction traffic through Old Street and James' Terrace are noted as areas with existing traffic constraints.

Concerns are raised in the submission over the possible removal of on-street parking and changes to traffic configuration on James Terrace.

Negative impacts on community facilities such as schools, shops, and recreational areas are noted in the submission.

Response to Issue Raised

Please see the response provided under Section 2.3.3.3 herein.

6. Summary of Issue Raised

The submission proposes a number of alternatives to those proposals within the Draft Railway Order, including the reconsideration of Option 5b:

- Option 5b, with the turnback facility relocated north of the existing crossing, would deliver TSS from a train operations perspective.
- Environmental Impact: Less loss of trees and hedgerows. Reduced visual impact for properties east of the railway.
- Noise and Vibration: Not near sensitive receptors for construction or operational noise.
- Transport Integration: No significant long-term impact on other existing transport systems.
- Residents' Welfare: Emphasizes the importance of considering the welfare of residents and homeowners.

Response to Issue Raised

Please see the response provided under Section 2.3.3.5 herein.

5.2.3 SB0100 – Malahide Marina Village Ltd

Representative: Damien Offer & Michael Anglim

Submission Location – Malahide Marina Village

1. Summary of Issue Raised

Malahide Marina Village Limited wish to confirm their support for the Project, subject to the requests outlined within its submission.

Response to Issue Raised

The Applicant notes and welcomes the support of Malahide Marina Village Limited for the Proposed Development.

2. Summary of Issue Raised

The submission requests that compensation payment is agreed prior to commencement of the Project works to cater for all damage, disturbances, disruption and inconvenience caused during the carrying out of the Project.

Response to Issue Raised

Parties affected by a CPO will be entitled to claim for compensation as part of the Railway Order (RO) process. The nature and type of this compensation will be determined as the Project progresses on a case-by-case basis specific to each property. The Project Team will engage with landowners on an individual basis to discuss the CPO process and how it might affect them in due course as part of the Railway Order (RO) process.

If the Railway Order is granted compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in the area of compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

3. Summary of Issue Raised

The submission requests that any and all restoration works are carried out or compensated for on completion of the Project.

Response to Issue Raised

Following the completion of relevant construction works, lands temporarily acquired will be fully reinstated and returned to the landowner.

Prior to construction works and subject to written agreement with the property owner, property condition surveys will be undertaken. Any specific risks or hazards will be outlined in the contractor's site-specific Construction Environmental Management Plan (CEMP), with construction works carried out in accordance with the industry best practices. The CEMP will also outline the monitoring plan that considers the construction works and nearby structures. Post construction, a condition survey will be carried out after the works are completed.

As stated above, any compensation relevant to the proposed works will be determined on a case-by-case basis. A chartered valuation surveyor experienced in the area of compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

5.2.4 SB0105 – Mary Theresa Cleary

Representative: Brid Torrades

Submission Location – Malahide Marina Village

1. Summary of Issue Raised

The submission raises concerns over noise and vibration impacts during the construction phase and the detrimental impact these could have on her 90-year-old mother's health.

Response to Issue Raised

Please see the response provided under Section 2.3.3.2

2. Summary of Issue Raised

The submission raises concern that the permanent raised walkway, handrail and lighting proposed would also have a similar effect and impact on the submitters 90-year-old mother's health and wellbeing in relation to visual impacts.

Response to Issue Raised

Please refer to Section 2.3.3.1 where these issues are addressed

3. Summary of Issue Raised

The submission raises concerns that stationary trains could compromise on privacy and security of the properties located adjacent to the proposed Malahide Turnback facility.

Response to Issue Raised

It is not expected that stationary trains will have any impact on the general privacy and/or security of properties within Malahide Marina Village.

The location of the turnback itself is located further south than the location referenced in the submission as described in Chapter 5 of the EIAR. Furthermore, when DART trains are availing of the turnback facility, the trains will not carry passengers. DART and train services passing by the Malahide Marina Village properties shall not be in any closer proximity to the properties than they are today.

4. Summary of Issue Raised

The submission notes concern relating to the potential impacts on the property's garden from loss of light due to the presence of stationary trains.

Response to Issue Raised

Please refer to Section 2.3.3.1 where these issues are addressed

5. Summary of Issue Raised

The submission raises some concerns relating to community impacts that the DART+ Coastal North development could have on the elderly, and their quality of life within Malahide Marina Village. The submission also raises further concern that the elderly community have not adequately been afforded the facilities to participate in consultation and development with respect to the proposed scheme.

Response to Issue Raised

Please refer to Section 2.3.3.4 where Human Health issues are addressed

1. Communications

The Applicant has worked hard to communicate widely and clearly with the general public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route throughout the design development.

A number of meetings have been held with residents of Malahide Marina Village at various points in the Project development to ensure that the Project proposals were clearly understood. Including, via MS Teams:

- 2023.04.18_Malahide Marina Limited
- 2023.04.19_Malahide Marina Village Board of Management

- 2023.06.23_Malahide Marina Village Residents (Inc Minister O'Brien)
- 2024.01.16_Malahide Marina Village Residents

These meetings were supplemented by letter and email correspondences with a view to the Project team gaining a clear understanding of the concerns of the Malahide Marina Village residents and to answering questions posed by the residents.

2. Format of communications (online / in-person)

As the range of items for discussion in relation to the proposed Malahide Turnback are very complex in nature and involve a wide range of specialists from a wide range of localities, a decision was taken to hold consultation with the residents via MS Teams to ensure that as wide a range of specialists would be available to contribute to the discussions as possible. The holding of these meetings via MS Teams was also intended to allow for as many residents as possible to join the discussions, noting that not all owners of properties within Malahide Marina Village reside in the area.

In addition to the MS Teams discussions that were held with residents, a public consultation event was held on 23 May 2023, in person, in St Sylvesters GAA club in Malahide, as part of Public Consultation No.2 where the Project team were available to discuss the Project and to take feedback.

5.2.5 SB0115 – Monobrio DAC

Representative: Cronin & Sutton Consulting.

Submission Location – Clongriffin

1. Summary of Issue Raised

The observer supports the Proposed Development where there is an identified need for certain facilities and infrastructure in the public interest. We confirm that the observer has had multiple meetings with Iarnród Éireann (IÉ) within the period between November 2022 and June 2024.

The design of the interface at Clongriffin Station with Project Shoreline has developed through this ongoing engagement between Arup (acting on behalf of IÉ), IÉ, CS, and MO, and considered the scenario where DART+ Coastal North is constructed post-development of Project Shoreline, which may not have been reflected clearly in the lodged planning documentation.

A close-out meeting was held on the 26/06/2024 over MS Teams between Arup, IÉ, CS and MO to review and agree the final designs which would facilitate the above scenario. A memorandum capturing points agreed at this meeting has been completed and is included with the submission to ABP.

The observer requests that the findings and agreements of said close out meeting (Appendix A) with specific reference to Section 4 ‘Final Design and Recommendations’ is considered by An Bord Pleanála and encapsulated in the permitted scheme and planning conditions if the development is so permitted

Response to Issue Raised

The DART+ Coastal North Project team appreciates the engagement and regular communications with the registered landowner, Monobrio DAC, and acknowledges the agreements that have been reached as summarised in the memorandum included in the submission to an Bord Pleanála.

5.2.6 SB0163 – Thomas McCarthy

Submission Location – Malahide Marina Village

1. Summary of Issue Raised

The submission raises concern with regard to excessive noise & vibration arising from the construction works related to the Malahide Turnback.

Response to Issue Raised

Please refer to Section 2.3.3.2 where these issues are addressed

2. Summary of Issue Raised

The Submission raises concern with regards to excessive dust arising from the construction works negatively impacting on air quality.

Response to Issue Raised

Please refer to Section 2.2.14 for information on dust and air quality linked to construction.

3. Summary of Issue Raised

The observer raises concerns relating to impacts on car parking in Marina Village during construction where carparking spaces will be reduced due to the location of the construction compound within the Malahide Marina Village.

Response to Issue Raised

Please refer to Section 2.2.18 for information with respect to potential disruption to parking during construction and to Section 2.3.3.3 for information on Traffic & Transportation associated with the Malahide Turnback works.

Management and coordination of access to the local businesses within Malahide Marina Village will be subject to further coordination between business owners and operators, Malahide Marina management, IÉ and the appointed contractor.

4. Summary of Issue Raised

Impacts on local businesses are raised as a concern by the observer.

Response to Issue Raised

Please refer to Section 2.3.3.3 where these issues are addressed

5. Summary of Issue Raised

The observer raises concerns relating to potential impacts on the security of properties in Malahide Marina Village during construction.

Response to Issue Raised

During the construction period it will be the responsibility of the appointed contractor to manage all construction related activities.

A Construction Environmental Management Plan (CEMP) has been prepared as part of the draft Railway Order application. The contractor will take ownership of the CEMP once appointed and will be responsible for providing appropriate security provisions during the construction works including site security measures and prevention of access to neighbouring properties.

6. Summary of Issue Raised

The observer notes concern with regards to impacts on natural light impacts during operation, due to the presence of additional infrastructure and the potential for stationary trains using the Malahide Turnback. Concerns are also raised in relation to the impact of artificial lighting from track and turnback on residential properties within Malahide Marina Village.

Response to Issue Raised

Please see the response under Section 2.3.3.1 in this regard.

7. Summary of Issue Raised

The submission raises concern relating to traffic impacts from construction in Malahide Village. Concern with possible impacts on emergency vehicles is also raised in this regard.

Response to Issue Raised

Please see the response under Section 2.3.3.3 in this regard.

5.2.7 SB0174 – Xeolas Pharmaceuticals Limited

Representative: John Hogan (Ogier).

Submission Location – Baldoyle

1. Summary of Issue Raised

The submission notes that Xeolas were not provided with advanced notification of the proposed temporary Compulsory Purchase Order relevant to their property and that there has been a lack of consultation between DART+ Coastal North and Xeolas. The submission further notes that Xeolas were only made aware of the temporary acquisition when the application for the Railway Order was served on the 10th of July 2024.

Response to Issue Raised

The DART+ Coastal North Project team acknowledges a lack of consultation with Xeolas Pharmaceuticals in advance of the Railway Order Application, during the design development phase.

The Applicant wishes to make clear that at all significant points in the design development of DART+ Coastal North, such as in advance of public consultations, the DART+ Coastal North team wrote to, or sought to write to, affected landowners to advise them of the design considerations relevant to their property and invited relevant feedback. During the Project's design development, the Project Team had identified McDermott Pharmaceuticals and Viatras Pharmaceuticals as the registered owners of the site contained in folio DN119969F and letters were duly issued to these companies as part of the consultation process. Unfortunately, no response was received to either this written communication or attempted phone communications. The change of ownership was not notified to us at the time. It was only during the Railway Order Application process that the design team became aware that there had been a change of ownership and that Xeolas had purchased the property (the purchase, we understand, having taken place in June of 2023).

It is not clear why the previous owners did not inform Xeolas about the proposed application for a railway order prior to the sale of the property. Since the lodgement of the Railway Order Application for DART+ Coastal North, our project team has engaged extensively with Xeolas Pharmaceuticals, through meetings, phone calls and emails, with a view to reaching a workable solution which addresses the concerns of the company. A summary of these communications is set out below:

- 2024.07.26: Initial request for further information and meeting from Xeolas (Tom Kirby, Avison Young)
- 2024.07.08: Meeting on site with Tom Kirby, Patrick Conway (IÉ), Garry Keegan (Community Liaison Office) & David Dineen (IÉ),.

- 2024.08.29: Follow up meeting to provide further clarity on what is proposed for the area to be acquired in CPO – i.e. the construction process, the duration for which the temporary compound is needed, etc, and to understand the critical issues that need to be addressed, such that impacts are minimised on Xeolas during the temporary acquisition period.
- 2024.09.02: Email from Tom Kirby of Avison Young noting agreement to facilitate access conditional on a number of points.
- 2024.09.05: Email response from Patrick Conway (IE), providing IE response to conditions accompanied by a sketch outlining the details of requirements of DART+ CN
- 2024.09.11: Request from Xeolas to mark out extents of lands required by CPO.
- 2024.09.24: Darragh Beirne (Project team – Engineering Manager) visited site. Discussed list of requirements from Xeolas and requirements of DART+ Coastal North.
- 2024.09.30: Letter issued with updated sketch seeking to reach agreement – based on items discussed on site on 24th Sept 2024
- 2024.10.14: Letter received from Xeolas noting access to magenta coloured area (carpark) can't be facilitated but access to blue and cyan areas (access route and facilities compound) can be facilitated.
- 2024.10.17: Meeting held to discuss actual need for use of magenta area and intention to only use at times agreed with Xeolas.
- 2024.10.21: Letter issued to Xeolas noting updates to proposals following meeting of 21st.
- 2024.10.22: Receipt of submission to ABP from Xeolas.

The extents of impact on Xeolas lands have been minimised to limit the level of impacts during the construction period when temporary land use will be required.

2. Summary of Issue Raised

The submission claims that Xeolas believe that in preparing the EIAR the selection process was flawed insofar as the ownership and use of the site by Xeolas was not considered or assessed and the occupation and use of the site by Xeolas was not properly interrogated or reviewed.

The submission further notes that the assessment summarised in Table 17-6 of Chapter 17 Material Assets is incorrect and erroneous as it does not consider the investment and use of the property by Xeolas. The submission quotes that the impact of the temporary land take was assessed in Table 17-6 of Chapter 17 Material Assets, Non-Agricultural Properties as follows:

- Impact Rating – Low
- Significance of Impact – Slight
- Residual Effect – Imperceptible

Response to Issue Raised

As detailed above, at the time of the design development and detailed environmental assessments, we were not aware that Xeolas Pharmaceuticals had acquired this property, and we had sought (without success) to engage with McDermott Pharmaceuticals and Viatras Pharmaceuticals.

From a review of available information (e.g. EPA database of licensed sites), it was also the Applicant's understanding that the site in question was not the subject of any licensing from the EPA relevant to pharmaceutical manufacture, including IPC, IPPC or IE licencing.

Further, as detailed herein, the nature of the proposed acquisition sought under the Railway Order application was temporary acquisition to allow the construction of the Proposed Development.

It was with this context that the assessment of impacts within Chapter 17 Material Assets – Non-Agricultural Properties was undertaken.

It is important to note that in this assessment, the baseline rating for the site in question was noted as High. The Applicant was aware that the property was listed as being in the ownership of pharmaceutical companies.

The magnitude of impact was determined to be low, based on the criteria developed for the assessment (and in consideration of the relevant EPA guidelines on the assessment of impact), see Table 17-3 of Chapter 17 Material Assets – Non-Agricultural Properties of the EIAR, which identifies the criteria for the low magnitude of impact as:

- An impact on the property where the use of the property can continue
- An impact resulting in a minimal effect on the character of the property
- Temporary loss of public right of way

Given the information available at the time of the assessment, the Low rating was considered appropriate.

As detailed in Section 17.3.2.4 of the EIAR, the *"significance of impact on a non-agricultural property is determined by the baseline rating assigned to the property combined with the magnitude of impact of the Proposed Development."* Table 17-4 of the EIAR details the likely significance rating, using the baseline rating and magnitude of impact.

For those properties with a 'High' baseline rating and 'Low' magnitude of impact, the significance of impact is determined to be 'Slight'.

The submission claims that the assessment is incorrect and erroneous in that “*it does not consider the investment and use of the property by Xeolas.*” The Applicant notes that at the time of the assessment and submission of the Railway Order application, it was not aware of the purchase of the site by Xeolas. While we are aware, since engaging with Xeolas, that it has future investment plans for the site, the assessment of effects remains the same.

3. Summary of Issue Raised

Further to the concerns raised in relation to the assessment summarised in Table 17-6, the following concerns are raised in the submission in relation to the use of Xeolas lands to establish a temporary Construction Compound to facilitate construction of a new SEB, station improvement, platform extension, turnback works and retaining wall.

The proposed temporary acquisition by DART+ of the carpark and access will render the Xeolas business unviable in so far as:

- There will be no access for trucks which ship Xeolas goods and the area required for use by DART+ is in the line of container traffic to and from the warehouse, for which there is no alternative access plan proposed or available,
- There will be no parking for staff members in a location where public transport options are limited and little or no secure parking alternatives exist,
- As Xeolas are a pharmaceutical company there is a huge emphasis on security and regulation which would be compromised as a result of the proposed acquisition, with the site being subject of extremely sensitive and important regulatory certification and approvals,
- The proposed acquisition would affectively landlock the facilities main source of fire protection; the water tank which is bound to the southern boundary of the site and is also bound by the proposed acquisition. This creates a health and safety issue for the operation of the facility.

Response to Issue Raised

As noted above, since the lodgement of the Railway Order application, the DART+ Coastal North Project team has been involved in extensive consultation with Xeolas regarding the issues raised by them (which are reflected in their submission to An Bord Pleanála), with a view to minimising potential impacts on Xeolas. Every effort has been made to address as many of the key items raised by, and discussed with, Xeolas throughout this consultation.

The Applicant notes that the Proposed Development requires temporary access to, and use of, the Xeolas carpark as a temporary construction compound area. Through discussions with Xeolas, an area has been identified to allow for site vehicles to turn around and exit the site. A temporary site facilities compound will be required in the southwest corner of the Xeolas property. These areas are expected to be required on a temporary basis for a duration of 3-months.

The Applicant has clearly communicated the expected requirements relating to the lands owned by Xeolas. The Project will require access to the existing Xeolas carpark for a temporary set down area for delivery of plant & construction materials across the 3-month period while works in the area are carried out. Disruption to Xeolas' own operational traffic and staff parking, as raised in points a & b above will be kept to an absolute minimum and will be coordinated with Xeolas in future.

A minimum width construction access is proposed to allow for site access for wide loads. This would be required over a 3-month period and the future DART+ Coastal North contractor will adhere to agreed restrictions on access through the Xeolas property and meet all Xeolas requirements to ensure Xeolas continue to meet their own security and other regulations raised in point c above. Access is to allow for in/out movements only for site vehicles and site traffic shall not access any area outside of the redline boundary identified by the Applicant.

The Applicant acknowledges the importance of maintaining access to the existing water tank in the southwest corner of the site, in light of the health & safety concerns raised in point d. During construction, access to this water tank will be coordinated with Xeolas to ensure the Proposed Development does not negatively impact on Health and Safety of the Xeolas plant and that access to the water tank is maintained.

4. Summary of Issue Raised

It is the view of the observer that there are suitable alternative sites which could be used for the temporary compound etc which are required for the Project, including adjoining lands which are undeveloped and would also benefit from adjoining the existing rail-line. Xeolas requests that An Bord Pleanála direct that the Xeolas lands (property reference numbers: 5005 T.1(A), 5005 4T.1(A), 5005 4T.5 (A)) are omitted from the Railway Order and that alternative sites be considered for the facility required.

Response to Issue Raised

Construction Compounds are required route wide at different locations to undertake the necessary works. The identification and sizing of these construction compounds were conducted with a focus on efficiently supporting the required construction activities.

In this specific location the compound is needed for the installation of a new turnback facility and set down of construction materials which require direct access to the railway line at this location.

Below is an overview of the process and considerations that were undertaken:

1. Identification and Siting of Construction Compounds

a) Proximity to Work Sites

- The temporary compound is strategically located near the trackwork, to facilitate plant and material storage, equipment access, and efficient transport logistics

b) Environmental and Community Considerations

- Environmental constraints, such as biodiversity impacts, and noise-sensitive receptors, were integral to compound selection. These considerations are outlined in Section 5.3.3.1 and summarised in Table 5-4. Efforts were made to minimise disruption to nearby communities, including mitigating noise and light pollution.

c) Access and Logistics

- The site was evaluated for accessibility, including road and rail connectivity, with Construction Traffic Management Plans implemented to minimise disruption to local roads and residents.
- All access points to the work site will be properly maintained to ensure safe circulation for construction plant, workers, and the public. Upon completion of works, all temporary access roads and Construction Compounds will be dismantled and the areas reinstated as required.

2. Sizing and Operation of Compounds

a) Activity-Specific Requirements

Compound size was determined based on the specific type of work. As described in the response to Point 3 above, the Project will require access to the existing Xeolas carpark for a temporary set down area for delivery of plant & construction materials, across the 3-month period while works in the area are carried out. Disruption to Xeolas' own operational traffic and staff parking, will be kept to an absolute minimum and will be coordinated with Xeolas in future.

A minimum width construction access is proposed to allow for site access for wide loads. This would be required over a 3-month period and the future DART+ Coastal North contractor shall adhere to agreed restrictions on access through Xeolas property and meet all Xeolas requirements to ensure Xeolas continue to meet their own security and other regulations

b) Sustainability Measures

Sustainability principles have been integrated into compound operations, including using local batching plants for concrete and recycling materials where feasible. These principles are detailed in Section 5.1.2.

As noted above, since the lodgement of the Railway Order application, the Applicant has been involved in extensive consultation with Xeolas regarding the issues raised in their Submission to An Bord Pleanála, with a view to minimising potential impacts on Xeolas. Every effort has

been made to address as many of the key items raised by and discussed with Xeolas throughout this consultation.

5.3 1.2 Zone C

5.3.1 SB0004 - Alcove Ireland Three Limited (AITL), McGarrell Reilly Group

Representative: McCutcheon Halley

Submission Location – Rush & Lusk

1. Summary of Issue Raised

The submission received from AITL raises concerns in relation to the Consultation Process.

Response to Issue Raised

The Applicant acknowledges an error was identified in the pre-application consultation file submitted with the Railway Order application to An Bord Pleanála on July 12th, 2024. A number of pages were missing. In compliance with a request from An Bord Pleanála, Córas Iompair Éireann (CIÉ) submitted a full and complete version of the pre-application consultation file and Notice given on the 9th of September that this was available at the public display locations and available to be view online at: www.dartcoastalnorthrailwayorder.ie.

In light of this, the period for public submissions was extended by a further six weeks to October 23rd, 2024.

2. Summary of Issue Raised

The observer states that in their opinion “*the Applicants have failed to comply with the Boards advice as the application documents do not address the adverse impact on future transport-orientated development and there is no record to indicate that the Applicants consulted the Board on the need to provide an OHLE maintenance compound as part of the overall project or on the specific proposal to CPO land in order to provide that facility alongside the substation at Rush & Lusk*”.

Response to Issue Raised

The Applicant refutes the contentions made in the submission in this respect. In the first instance, the submission references the pre-application consultation process and discussions in this regard with An Bord Pleanála. The Applicant notes that it had regard to all advice provided by the Board. The Railway Order documentation includes all necessary information to allow An Bord Pleanála to reach a decision on whether a Railway Order should be granted and in so doing to reach a reasoned conclusion on the Proposed Development, in respect of EIA and AA.

In respect of potential adverse impacts on future transit-oriented development, the Applicant notes that to enable transit-oriented development, you must first put the public transport infrastructure in place. A clear objective of the DART+ Coastal North Project is to increase the capacity and frequency of service on the Northern Line (inclusive of the Howth Branch). The policy context and need for the development are set out clearly in Chapter 2 Policy Context of the EIAR.

As set out in Chapter 3 Alternatives, eight substations are required along the route of the railway line. In selecting the site for the proposed substation at Rush & Lusk (where the subject lands are located) as part of the DART+ Coastal North Project, the Applicant followed the robust process set out in Chapter 3 Alternatives of the EIAR (Section 3.5.2).

Once the substation site was selected, the design was further developed. This included development of the permanent and temporary access arrangements for the substation, which, in consultation with Fingal County Council, identified the need for permanent and temporary acquisition of land to the northeast of the substation, through AITL lands to accommodate a temporary compound and both permanent and temporary access to the substation. These have been included in the Railway Order, see Book 1 Work Plans and the associated schedules. The Applicant would also note that the said lands are zoned RU - Rural in the Fingal County Development Plan 2023-2029.

The design development was in accordance with all relevant best practice guidance, as well as consideration of nearby receptors, both for the construction and operational phases of the Project, in respect of residential amenity, noise and other factors. A detailed environmental assessment was undertaken as presented in the specialist chapters of the EIAR.

Separately, an OHLE maintenance compound needed to be included in the DART+ Coastal North Project at an appropriate location. Given the location of Rush/Lusk substation and the fact that it is located within IEÉ lands, the OHLE maintenance compound was located at the substation site (see response to point 4 below for further details). As noted in section 4.8.5.2, Chapter 4 of the EIAR, the proposed substation and OHLE compound site are within the existing IEÉ property boundary. Access to the OHLE maintenance compound will be via the proposed substation access and junction with the R128.

The submission states that *“it was implied that there would be limited requirement for land purchase given that the infrastructural works are largely confined to the existing railway corridor and, where additional land take is required, it would be for structures which were specifically required for the implementation of the electrification project.”* The Applicant trusts that the above explains why this land take is required for the implementation of the electrification project. Both the substation and OHLE maintenance compound are essential for the implementation and operation of the electrified railway.

Whilst the Applicant acknowledges the impact of loss of road frontage to AITL, accommodations have been made in the design of the access to the Rush & Lusk Substation and OHLE Maintenance compound to ensure that continued access to Station Road can be

achieved via a shared access, subject to an agreed right-of-way, should the need arise in the future as part of any future planning application by AITL.

The Applicant also points towards a period of extensive consultation with AITL, carried out during the Project development, where numerous iterations of the Project design were developed further to feedback from AITL with a view to minimising potential impacts on AITL lands and their plans.

Between 12th June 2023 and 14th November 2023 inclusive, five meetings were held via MS Teams between the DART+ Coastal North Project team and representatives of AITL. These meetings, supplemented by intermittent email correspondences, led to an agreement in principle between parties of the DART+ Coastal North design layout.

3. Summary of Issue Raised

The submission raises concerns in relation to legal & procedural issues in the completion of the Railway Order Application for DART+ Coastal North.

The submission states that *“the Board had advised the Applicants of the need to justify the use of their power of compulsory purchase by demonstrating that all alternative options have been taken into account, that the land-take is proportionate.”* In the opinion of AITL *“the Applicants have failed to heed the Boards advice on this fundamental issue as the application documents do not include:*

4. *A proper consideration of alternative locations, layouts or designs for the substation and OHLE maintenance compound at Rush & Lusk as part of the environmental impact assessment, or*

A proper justification for the use of compulsory purchase to improve access to the east of Rush & Lusk station instead of the partnership approach which was offered by our clients during the consultation process.”

The submission states its belief that *“the Board is legally obliged in this case to consider whether the operational benefits to CIE of locating the OHLE maintenance compound to the east of the railway line at Rush & Lusk, rather than at alternative locations which would not require any CPO, such as:*

5. *To the west of the railway line at Rush & Lusk, or*
6. *Elsewhere on CIE property between Malahide and Drogheda, or*
7. *Elsewhere within the DART+ network.”*

Response to Issue Raised

In the opinion of AITL *“.....the application documents do not include:*

A proper consideration of alternative locations, layouts or designs for the substation and OHLE maintenance compound at Rush & Lusk as part of the environmental impact assessment.....”

In selecting the site for the substation proposed for the DART+ Coastal North Project, the Applicant followed the process set out in Chapter 3 Alternatives of the EIAR. As detailed in Chapter 3 and in Section 3.5.2 in particular:

“The siting of each substation within any general area has considered the following:

- *The land-use and development context of potential locations;*
- *The substations will be located adjacent to the railway line in the form of a fenced compound surrounding a single storey building which will house all the necessary electrical switching and feeding equipment;*
- *The substations will be connected to the local power distribution network and the OHLE system using insulated cables. These cables will be installed in buried routes for additional protection;*
- *The substations will need to be accessible from the local road network for construction and maintenance purposes; and*
- *The footprint of each substation compound and requirement for the building to house the electrical equipment for both IÉ and ESB.”*

Alternative sites to the west of the railway were considered but were found to be unsuitable for several reasons. Firstly, these sites would significantly impact the long-term parking provision at the station, which is essential to support increased train service frequency. A reduction in parking capacity would compromise the station’s ability to meet future demand.

Secondly, consultations with Fingal County Council regarding their greenway project and active travel objectives - particularly the connection between Rush and Lusk - raised further concerns. The western sites, especially those to the south, would disrupt the emerging preferred route for the greenway and the Proposed Development of an active travel hub within the station car park.

By selecting a site to the east of the railway, these issues are avoided. This location better supports the integration of transport services, enhances economic opportunities, and more effectively contributes to achieving a modal shift in the area.

In addition, the site at Rush & Lusk provides the most efficient and appropriate solution for the OHLE compound, balancing operational needs, land-use considerations, and stakeholder concerns. The proposed location leverages existing IÉ operations, minimises disruption using IÉ-owned land, and addresses cumulative traffic impacts through targeted infrastructure upgrades (see response to point 4 below for further details).

The site selected for the substation and the OHLE maintenance compound is within IÉ owned lands. While permanent land acquisition is required to provide access to the substation (and OHLE maintenance compound), from Station Road, the Applicant has been very willing to

work with AITL (as demonstrated through the extensive consultation to date – see response to point 2 above) to ensure that any plans for these lands can be accommodated, with minimal impact.

The Applicant remains committed to the partnership approach referenced by AITL in its submission and will work with AITL throughout, to ensure that any impacts are minimised.

5. Summary of Issue Raised

The AITL submission notes that the EIAR noise assessment assumes that the compound would be used for storage of spare parts and for parking of the OHLE maintenance vehicles which have direct access from the compound to the track. Any noise from the OHLE maintenance activities would be generated along the railway line where the overhead equipment is maintained in situ rather than within the compound. The submission states that there was therefore:

“no evidential basis for the Applicant's refusal to consider a partnership approach to junction improvement on grounds of noise impacts from adjoining OHLE maintenance activities, and no justification for the imposition of a CPO for an access upgrade which, if and when necessary, could be achieved by agreement with AITL as part of an integrated railway and transport-orientated development.”

Response to Issue Raised

Between 12th June 2023 and 14th November 2023, five meetings were held via MS Teams between the DART+ Coastal North Project team and AITL representatives. These discussions, supplemented by ongoing email correspondence, resulted in an agreement in principle on revision three of the proposed junction layout. The selected site for the OHLE maintenance compound and electricity substation is already within IE ownership, minimising the need for further compulsory purchase orders (CPOs) and associated disruption. The new access arrangement to the Rush & Lusk Station, carpark, proposed substation and proposed OHLE maintenance compound has not been imposed to avoid, prevent or reduce potential operational noise impacts from the substation or OHLE maintenance compound. The operational substations and fixed plant are not predicted to result in any significant operational noise effects; therefore, no noise mitigation is proposed (section 14.6.2.5, chapter 14, vol 2 of the EIAR).

Any planned maintenance of the Proposed Development will be implemented following relevant Iarnród Éireann noise management procedures as stipulated in Chapter 14 of the EIAR. This includes the need to implement *“all attempts to avoid, prevent or reduce the harmful effects of exposure to environmental noise”*. The Iarnród Éireann noise management procedure has been considered in the design of the Proposed Development to avoid the potential for environmental noise impacts from the substation and OHLE maintenance compound.

AITL shall retain right of way / wayleave over the extents of the access that is required to access their lands. Should the lands be subject to development in future, part of any development will need to involve negotiations with CIÉ regarding this access, and CIÉ's rights to retain access to Rush & Lusk Station, Carpark, and the future Rush & Lusk Substation.

The Applicant remains committed to the partnership approach referenced by AITL in its submission and will work with AITL throughout, to ensure that any impacts are minimised.

6. Summary of Issue Raised

During the bilateral pre-application consultation with our client, the Applicants clarified that they are proposing to replace AITL's direct vehicular access onto the public road network with a right of way/wayleave onto a private access road "*to the extents that is required to access their lands*". It was implied that the proposed concession of a right of way through Iarnród Éireann property is confined to the current use of the lands (cultivation) as the Applicants also stipulated that "*should the lands be subject to development in future, part of any development will need to involve negotiations with CIE with regard to this access*".

This would represent a significant reduction of the current utility and development potential of the holding as AITL do not currently require the consent of Iarnród Éireann to:

avail of a wide range exempted rural developments including substantial farm buildings and intensive agricultural uses such as horticulture market gardening and plant nurseries without applying planning permission; and
apply for planning permission for the developments listed as "permitted in principle" under the RU zoning objective

Response to Issue Raised

Extensive consultation has been undertaken with AITL to address concerns related to the proposed road junction and its integration with AITL's master plan for the area. Between 12th June 2023 and 14th November 2023, five meetings were held via MS Teams between the DART+ Coastal North Project team and AITL representatives. These discussions, supplemented by ongoing email correspondence, resulted in an agreement in principle on revision three of the proposed junction layout. This design ensures that access to AITL's lands, which have limited road frontage due to their shape, is maintained and unaffected by the proposed works.

The Applicant remains committed to the partnership approach referenced by AITL in its submission and will work with AITL throughout, to ensure that any impacts are minimised.

7. Summary of Issue Raised

The submission received from AITL raises concerns that no rationale appears to have been provided for the design brief for the "compound" which extends well beyond the operational requirements for the maintenance of overhead line equipment.

According to Subsection 4.12.1 of the EIAR, OHLE maintenance is only carried out four times a year working 6 nights of the week and involves the use of specialised vehicles which are parked of the compound from where they travel onto the rails.

Response to Issue Raised

The proposed facility is to provide office and welfare facilities for staff. Staff will include traction maintenance electricians & supervisors, OHLE operatives & supervisors, technical & compliance staff and managers. They will be responsible for operating and maintaining the 40km of new electrification. Engineers, electricians, linesmen, health and safety and administration personnel will be needed at a central location to efficiently manage the system and respond to issues.

An existing similar facility exists at Fairview in central Dublin, from where the existing DART system is managed. A further facility is proposed at Navan Rd parkway to service the DART+ West extension from Connolly to Maynooth. A new facility in Inchicore is proposed for DART + South-West.

It is also required to provide space to park specialist maintenance plant and vans, space for stored materials, along with various tools and equipment.

The maintenance referred to in EIAR 4.12.1 refers to periodic planned maintenance of the overhead catenary system. Ongoing inspections are required on a weekly basis. Emergency response teams must be available at a convenient location on a 24/7 basis to deal with situations such as storm damage, short circuits, resetting switches, general failures and faults, etc.

Additionally, to provide safe access for civil engineering maintenance teams at night, staff must be available to earth and isolate the wires and disconnect the power supply from substations.

5.3.2 SB0018 – Tony Bell, BH Imports

Representative: Rachel Kenny (RMK Planning)

Submission Location – Balbriggan

1. Summary of Issue Raised

The submission supports the extension of the DART to Drogheda, however objects to the element of the Proposed Development which relates to the CPO of his lands for a substation at Folio Number: DN484F. The submission considers that by not considering the effect of the substation on Mr. Bell's farm and farming practices this shows non-compliance with County Development Plan objectives and policies.

Response to Issue Raised

The Applicant acknowledges and welcomes the support for the DART+ Coastal North Project from the affected landowner.

1. Lands to be Acquired

The land to be acquired from Mr. Bell, BH Imports Ltd., includes land to be permanently acquired for a substation (which is needed for electrification of the railway line) as well as land to be acquired on a temporary basis to enable construction of the substation.

The extents of the lands in the ownership of Mr. Bell included in the Railway Order application are referenced as DCN.5028.P(A) representing the extents of permanent land take proposed by DART+ Coastal North, and DCN.5028.T.5(A) and (B) representing the extents of temporary land take proposed.

The extents of lands to be acquired was established through a detailed option selection process which is described in Chapter 3 Alternatives of the EIAR.

2. Options Selection Process

As part of the option selection process, the siting of each substation within any general area considered the following:

- The land-use and development context of potential locations;
- The substations will be required to be located adjacent to the railway line in the form of a fenced compound surrounding a single storey building which will house all the necessary electrical switching and feeding equipment;
- The substations will be connected to the local power distribution network and the OHLE system using insulated cables. These cables will be installed in buried routes for additional protection;
- The substations will need to be accessible from the local road network for construction and maintenance purposes;
- The footprint of each substation compound is estimated to be up to approximately 1,900 sqm and will include the building required to house the electrical equipment for both IÉ and ESB.

The location of each of the 8 substations required by the Project is highly sensitive to the requirements of the DC system utilised by DART services and each substation is required to be located as close as possible to an optimum location identified in the power study completed as part of the design development.

Detailed descriptions of the options considered were presented in the Option Selection Report (comprising Volume 1: Preferred Option Report and Volume 2: Technical Report) which was

published and presented during the second round of public consultations held between 09th May 2023 and 23rd June 2023. These reports with annexes are also appended to this report for information and can also be viewed on [dart-coastal-north-public-consultation-no-2-useful-material-and-downloads](#).

Section 5.6.5 in the Option Selection Report, published as part of Public Consultation No.2 outlines the results of the preliminary sifting and Multi Criteria Assessment processes in relation to the proposed Balbriggan Substation.

Following the Multi-Criteria Assessment, Option 3 was identified as the preferred option. This was based on the comparative assessment of the three options against set criteria. Option 3 (Proposed Development option) was identified as the Preferred Option. The basis for the selection of Option 3 is as follows:

- Economy: Options 1 and 2 have some comparative advantage as the length of access road and new highway connection in Option 3 has greater associated capital cost.
- Environment: Options 2 and 3 have comparative advantage since option 2 has significant comparative advantages from Geology and Soils, and Agricultural perspectives and Option 3 has significant comparative advantages from Landscape and Visual Quality, Noise and Vibration and Archaeology, Architectural and Cultural Heritage perspectives.
- Accessibility & Social Inclusion and Physical Activity: all options are comparable.
- Integration: Option 3 has comparative advantage from a land use perspective as Options 1 and 2 are encompassed by the Part XI approval for a recreational park.

It is also noted that Option 3 is located on the northern periphery of the ideal location from the power study, and any locations further north will have an adverse effect on the power demand for the new electrification.

3. Mr. Bell, BH Imports Ltd.'s Lands and Impacts thereon

Mr Bell, BH Imports Ltd.'s land parcel folio Number DN484F is identified in Volume 4 Appendices of the EIAR, Appendix A16.1: Material Assets Agricultural Properties as land parcel Reference No 40 at chainage 38+800. It is shown in the Railway Order application in Book 2, Property Plan No. 28. Mr Curtin (competent expert and author of the Material Assets: Agricultural Properties Assessment) visually assessed this property on June 13th, 2024, from the public road.

The EIAR focuses on the land parcels directly affected by the Proposed Development as stated in Section 16.3.4, Study Area, Volume 2 of the EIAR. It is acknowledged in Section 16.4.3, Agriculture in the Study Area, Volume 2 of the EIAR, that landowners may also own, lease and rent land in land parcels not directly impacted by the Proposed Development. Including all owned and farmed land parcels would result in a lower categorisation of impacts, for example, the loss of 1 hectare from a 10ha land parcel would have a higher magnitude of

impact than the loss of 1 hectare from a 100ha land parcel. Therefore, it is the agricultural activity, and the impact thereon, on the directly affected land parcel that is assessed in the EIAR.

4. Description of land parcel within the EIAR

In Appendix A16.1 Reference No 40 is described as a medium sensitivity tillage land parcel. The enterprise is described based on visual assessment and examination of aerial photography. The sensitivity is assessed according to professional judgement and the criteria set out in Section 16.3.1 Evaluation of Baseline Sensitivity, Volume 2 of the EIAR. In the case of land parcel reference No 40 this assessment is based on the farm enterprise which is tillage.

The overall impact assessment is based on the evaluation of the baseline target, in this case a medium sensitivity tillage farm; evaluation of magnitude of impact and assessment of significance of impact is based on the sensitivity and magnitude. This methodology is set out in Sections 16.3.1, 16.3.2 and 16.3.3 of Vol 2 of the EIAR. Appendix A.16.1 shows that approximately 1.2ha will be permanently acquired. This will be fenced off and no longer available for agricultural production – it is a permanent loss. In addition, approximately 0.9ha will be temporarily acquired for use as a compound and following construction this temporarily acquired land will be returned to Mr Bell where it can be used for agricultural production in the future. The criteria used for the assessment of magnitude are described in Section 16.3.2 of Vol 2 of the EIAR. As set out in Section 16.5.1.3 of Vol 2 of the EIAR it is assumed that temporarily acquired land for construction compounds will result in long term (>15 years) damage to soil structure. Therefore, while the land may be used for agricultural production, there will be long term yield reductions.

The impact assessment firstly determines the residual effects of the construction phase based on the likely potential impacts described in Section 16.5.1 of Vol 2 of the EIAR. Then the assessment considers the mitigation measures that are committed to as set out in Section 16.6.1 of Vol 2 of the EIAR and whether these mitigation measures will reduce the residual impact. Secondly, the assessment determines the residual effects of the operational phase based on the likely potential impacts described in Section 16.5.2 of Vol 2 of the EIAR and the land take and severance measurements shown in Appendix A.16.1. Then the assessment considers the mitigation measures that are committed to as set out in Section 16.6.2 of Vol 2 of the EIAR and whether these mitigation measures will reduce the residual impact.

The result of the assessment is a Not Significant residual impact based on;

- No significant severance arising from the impact;
- The total area of permanent land take being 2.5% of the land parcel; and
- 1.8% of the land parcel being temporarily acquired.

As stated in Section 16.3.3 and Table 16-3 of Vol 2 of the EIAR a Not Significant Impact is one which results in measurable effects and / or noticeable changes but the consequences

are not significant. This assessment assumes that the financial position of the landowner is maintained by statutory compensation.

5. Conclusion

The agricultural assessment has assessed the nature of farming on Mr Bell's land parcel and has assessed the impacts. It is the professional opinion of the author of the assessment in the EIAR that the tillage enterprise is a medium sensitivity receptor and that the residual effect is adverse but not significant.

In respect of compliance with the Fingal County Development Plan, please see the response under Point 3 and Point 6 below.

2. Summary of Issue Raised

With regards to communications, the submission claims insufficient meaningful engagement with the landowner throughout the Project development.

Response to Issue Raised

With regard to prior consultation with the submitter, the Applicant has worked hard to communicate widely and clearly with the general public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route. The Project design evolved throughout the early design stage. This meant that additional potentially impacted landowners / occupiers were identified as the Project design progressed. The Applicant attempted to identify and notify potentially impacted landowners / occupiers as soon as the need for land acquisition at their property was identified. In relation to this submission, the lands were identified as lying within the Project boundary at PC2 as part of the Preferred Option. Property owners' names have been identified via Property Registration Authority of Ireland (PRAI) searches.

The Project team has engaged directly with this property owner since it became apparent that lands registered to them would be impacted by the Project. Initially, as part of a wider mail-out to all properties in the Project area, a leaflet was distributed to this property at the start of PC1 in Q3 2022. A letter and leaflet were sent to the landowner following identification of substation locations as part of PC2 documentation in Q2 2023, notifying them that their property was within the extents of the Project boundary. Prior to this notification there had been consultation with the landowner in relation to permission to carry out environmental surveys on his lands.

Further to the publication of the Preferred Option in PC2 there has been a significant effort to engage with the affected landowner which ultimately failed to result in a meeting being set until after the submission of the Railway Order application. The Applicant wishes that meaningful discussions with this landowner could have been held earlier in the process, however it is felt that sufficient effort was made to engage with the landowner through the design development. The Applicant appreciates the landowner's constrained position with

regard to ongoing consultation with the NISA project which may have limited him in terms of engagement with the DART+ Coastal North Project, however, it remains the case that the Project Team remained available for consultation and engagement throughout the process.

A summary of key communications is presented below to demonstrate the efforts made to engage with the landowner:

- 2023-06-08: Receipt of PC2 Feedback Form, outlining some concerns with the proposals of DART+ Coastal North. The feedback was acknowledged and relayed to the Project Team as part of PC2.
- 2023-10-11: Further to requests to access lands to carry out environmental surveys, and receipt of some queries from the landowners, a call was made by the Community Liaison Officer (CLO) to the landowner to provide an update on the DART+ Coastal North Project and provide clarification to queries. Concerns were raised by Mr Bell in relation to ongoing discussions taking place between the landowner and the North Irish Sea Array (NISA) offshore wind project. Further to this call the DART+ Coastal North Project team began engagement with NISA which continued through the Project development. The phone call raised concern with the potential for DART+ to impact on existing agreements with NISA and raised concern over a lack of engagement by the DART+ Coastal North team to date. Mr Bell raised concerns that he needed to engage with NISA to establish how much engagement he could have with DART+ Coastal North as they were in ongoing confidential talks over a deal for a portion of his lands.
- 2023-10-17 to 2023-10-25: Email correspondence attempting to make arrangements for a meeting which was ultimately set for Nov 2nd 2023 via MS Teams, for which a meeting invitation was issued.
- 2023-10-27: Email from Mr Bell declining to proceed with meeting scheduled for 2023-11-02 and requesting written documentation of details of what is proposed by DART+ Coastal North.
- 2023-11-07: A letter and supporting layout drawing were issued to Mr Bell providing all relevant details of the proposals and providing clarification to previous queries.
- 2023-11-15: Email received from Mr Bell noting receipt of letter and appreciating the explanation provided. This email raised concerns related to ongoing discussions which the landowner is engaged with NISA. Email noted that a meeting with DART+ Coastal North would be beneficial but also that Mr Bell was waiting on feedback from the NISA team before progressing with anything. An additional request to set a meeting was made by phone following this email which was declined pending further talks between Mr Bell and NISA.
- Between November 2023 and April 2024 consultation was held between the Applicant and NISA to ensure both projects could interface without negatively impacting on each other.
- 2024-06-17: A letter was issued to all landowners within the extents of the DART+ Coastal North Project advising them that they would be included in upcoming correspondence regarding server packs linked to the DART+ Coastal North Project and advising them to make contact with the Design Team with any queries or concerns.

- 2024-09-03: Phone call between Mr Bell and CLO requesting a meeting to discuss project proposals. It was noted that a Memorandum of Understanding had been agreed with NISA in relation to his lands. Mr Bell was advised to make a submission on the Project as part of the statutory consultation process. An explanation of constraints related to the statutory process was offered by the CLO. Mr Bell noted his intent to lodge a submission in the coming week. Additional phone calls led to a letter being received from Mr Bell.
- 2024-09-18: Letter received from Mr Bell to the Project Team outlining concerns and issues with the proposed sub-station on his lands and requesting a meeting.
- 2024-09-30: Landowner meeting held with Mr Bell at his office in Balbriggan. Details of the Project were discussed at length, including the rationale for the selection process behind the location of the Balbriggan Substation and responses to queries were put forward.

In addition to the above, additional emails and phone correspondences have taken place in relation to coordinating dates for meetings and requesting permission to complete environmental surveys. Further engagement took place where issues were flagged by Mr Bell in relation to an occurrence of a surveyor accessing his lands without prior permission, an occurrence which the Project Team discussed with Mr Bell through the CLO, and for which the Project Team was deeply apologetic.

3. Summary of Issue Raised

In respect of landscaping – the submission notes that it is unsure of what is proposed to soften the fencing and proposed asphalt road and how it would blend with the environment. The submission notes that it equally found unclear the landscape/ planting plan to improve the visual impact of the construction compound. There was considered to be a lack of clarity regarding the existing hedgerow along the boundary with O'Dwyer's GAA, and how this will be maintained in between two sets of palisade fencing.

The submission claims that the Proposed Development is not “Permitted in Principle” based on the lands being in a high amenity area – in material contravention of the HA zoning. It also notes that the lands are within a Coastal Character type – with the Proposed Development being inappropriate for this landscape character type. The submission also notes that a comprehensive LVIA should have been completed of Mr. Bell's lands in respect of the Proposed Development due to the lands being of high amenity and coastal character.

Response to Issue Raised

1. Landscape & Visual Assessment, and Landscaping

The proposed sub-station has been included in the landscape and visual impact assessment presented in the EIAR. In Chapter 15, in Volume 2 of the EIAR, the landscape and visual assessment notes “*The construction works for Balbriggan Substation will be visible from the preserved view at the R132 Bremore. The works will include removal of a section of hedgerow along the eastern side of the road, construction of a new access route and introduction of the*

substation in an adjacent field. The works will interfere with the sea views to the east. The sensitivity is high and the magnitude of change is high. The landscape / townscape and visual effect of the Construction Phase on these preserved views will be Significant, Negative, Temporary / Short-term.”

Mitigation measures included for the location and design of this substation as set out in Section 15.6.3 of Chapter 15 of the EIAR, include:

- *“Offset of access road to sub-station at Balbriggan to retain / augment field boundary hedgerow; Provide space for new screen planting around north, west and south of sub-station at Balbriggan North including around infiltration basin.”*

In Figure 15.3 within Volume 3A of the EIAR the landscape mitigation for the proposed substation is presented. Proposed native screening vegetation is indicated on the plan. This landscape planting will screen the proposed fencing along the access road and assist in screening the substation.

Plans of the substation layout including landscaping and planting are included in Book 3 of the Railway Order, Specific Locations No. 09 (Balbriggan). This plan identifies areas of proposed planting wildflower and landscaping to screen the substation. The plans also indicate where existing vegetation is to be retained along the hedgerow on the southern side of the access road and substation site.

Figures 15.3.38.1 and 15.3.38.2 within Volume 3B present a photomontage of the view from the R132 towards the substation. The proposed views are shown with proposed planting / mitigation at approximately 10 to 15 years post-completion of the Construction Phase. The photomontages have been prepared in accordance with the methodology set out in Section 15.3.3.1.9 of the EIAR.

2. Permitted in Principle

The proposed substation is a critical component of the DART+ Coastal North Project, a development of strategic national importance aimed at enhancing sustainable public transportation. While the submission asserts that the development contravenes High Amenity (HA) zoning and Coastal Character Area policies, the Project adheres to principles of balanced and considered development.

The High Amenity zoning seeks to protect and enhance sensitive landscapes while allowing limited and appropriate development that supports regional and national objectives.

The substation:

- Meets strategic infrastructure needs as a vital component of the electrification of the DART line, providing a step toward achieving national climate goals by reducing reliance on fossil fuels.

- The Project has undergone a detailed optioneering process, ensuring that its design respects the character of the HA lands and mitigates potential visual and environmental impacts.
- By enhancing public transport infrastructure, the Project supports broader public benefits by contributing to the reduction of private vehicle use, aligning with the environmental conservation principles underlying HA zoning.

While certain uses are listed as “not permitted” under the zoning, the substation does not align with the typologies cited in the submission, such as builders' yards or road transport depots. Instead, it constitutes essential public infrastructure, distinct in purpose and design.

The Coastal Character Area policies emphasise protecting areas of exceptional landscape and ecological value. While these policies discourage inappropriate development, they recognise the importance of carefully locating necessary infrastructure in ways that minimise impact and respect the unique character of these areas. Demonstration of careful consideration of alternatives and compatibility with the character and sensitivity of the coastal area is available in the EIAR.

The DART+ Coastal North Project, including the substation, represents a balanced approach to development, aligning with zoning objectives while addressing national infrastructure needs. The careful planning, design, and mitigation measures ensure the Project respects the character and sensitivity of HA lands and Coastal Character Areas. This development is not a material contravention of the Development Plan but rather a strategic enhancement of sustainable public transport infrastructure, in keeping with the overarching goals of Fingal County Council's policies.

4. Summary of Issue Raised

The submission claims in respect of ecological impacts that the Applicant proposes to remove existing hedgerow along the boundary with O'Dwyers GAA, without survey or regard to the evidence of Badgers at this location.

The submission notes that badgers have been recorded on lands – and notes that it is proposed to remove hedgerows with badgers without setting up trail cameras.

The submission claims that the area in which Mr. Bell's farm is located is included in the relevant mapping for the Agri-Climate Rural Environment Scheme (ACRES). This scheme supports overwintering birds, including the Brent goose, which arrive in Ireland in September before returning north to breed. The submission also claims that Brent geese were observed in the field adjacent to Mr. Bell's land and that this has not been accounted for in the NIS.

Response to Issue Raised

The Applicant firstly notes that a robust biodiversity impact assessment for the Proposed Development has been undertaken and is presented in Chapter 8 Biodiversity of the EIAR.

This assessment has been undertaken in accordance with best practice methodology and guidance, as set out in Section 8.2 of the EIAR.

A Natura Impact Statement has also been prepared and accompanies the Railway Order application. Again, this assessment has been undertaken in full accordance with relevant legislation and best practice guidance.

Breeding bird surveys were undertaken within this location. The results of the breeding bird surveys are included in Figure 8.7 Survey Area 7 of the Biodiversity Chapter. Mitigation measures to prevent habitat loss/fragmentation, mortality and disturbance/displacement impacts on breeding birds are included in Section 8.9.1.3.6 of the Biodiversity Chapter. Habitat surveys were also undertaken in this location with the results shown on Figure 8.3.

Wintering bird surveys were also undertaken in respect of the Proposed Development, to capture known areas of sensitivity immediately intersected by or running alongside the rail corridor. The primary focus of the wintering bird surveys included areas that contained suitable habitat such as short sward amenity grassland and wetland habitats. It is acknowledged that wintering bird surveys weren't carried out within this location, as it is typically winter stubble and it noted that this location was not an IWeBS survey location, as shown on <https://irishwetlandbirdssurvey.ie/>.

However, lands approximately 300m south of the proposed substation were subject to surveys, based on ornithological judgment, owing to the high value habitat for brent geese and other wintering bird species, in this area, i.e. short sward amenity grassland. Whilst it is acknowledged that wintering bird species may use arable lands in the winter for foraging, *ex-situ* foraging sites e.g. inland sites used preferentially by wintering birds is often short grassland swards rather than stubble.

Furthermore, given that the proposed boundary of the substation is along the edges of the field, it is considered unlikely that impacts on foraging wintering birds would result in an adverse effect on the integrity of European sites and affect the conservation objectives of wintering bird species. This is due to the predator avoidance technique that wetland and wildfowl bird species use, by foraging mainly in the centre of fields and away from hedgerows to avoid predation. The remaining habitat in the field would remain suitable for wintering bird species, and the abundance of surrounding suitable habitat would ensure, with the full implementation of the mitigation measures described in the EIAR biodiversity chapter and NIS as appropriate, that there is no significant impact on local bird species, either breeding or wintering birds.

1. Badger Surveys

Badger surveys were undertaken within Mr Bell, BH Imports Ltd.'s lands during the habitat/multidisciplinary walkover surveys completed in August 2023. No badger setts were identified during the walkover within the Proposed Development boundary. It is acknowledged within Section 8.9.1.3.1 that badgers can establish new setts at any time prior to construction,

and therefore mitigation is proposed to include for pre-confirmatory checks to be carried out within all areas of suitable badger habitat within 12 months prior to construction works.

2. Hedgerow

The hedgerow along the boundary with O'Dwyers GAA will be retained adjacent to the proposed access road to the substation. Figure 15.3 in Volume 3A of the EIAR presents the area of potential vegetation removal along the R132 road in order to provide the new entrance and to allow sight lines for vehicles to safely exit the substation compound. The plans indicate the *“area of vegetation to be maintained where possible whilst achieving required sight lines. Local removal may be required”*.

Ecological surveys were carried out within this location, including breeding bird, habitat, and multidisciplinary (including mammals) surveys. Badger setts were not identified within the proposed substation and access road boundary, including where hedgerow removal may be required to achieve required sight lines. Hedgerow planting is also proposed along the access road to account for any loss, which will also provide additional habitat for local fauna species. It is acknowledged within Section 8.9.1.3.1 that badgers can establish new setts at any time prior to construction, and therefore mitigation is proposed to undertake pre-confirmatory checks in all areas of suitable badger habitat within 12 months prior to construction works. Mitigation is also provided in Section 8.9.1.3.6 of the Biodiversity Chapter of the EIAR to prevent mortality and disturbance / displacement impacts on breeding bird species.

5. Summary of Issue Raised

The submission notes that the impacts of construction of the proposed substation and access road on Mr. Bell's farming practices have not been considered.

Response to Issue Raised

The Applicant has considered the impacts of construction of the proposed substation and access road on Mr. Bell's farming practices. In this regard, the Applicant would refer to the response under Point 1 above, as well as the response provided under Point 6 below.

The construction phase impact was assessed in Chapter 16 Material Assets: Agricultural Properties of the EIAR as 'not significant' following the implementation of mitigation measures.

6. Summary of Issue Raised

The submission notes, in respect of the current agricultural use of the land, that the Project is in material contravention of the Fingal Development Plan objectives and policies as they relate to farming, food security and protection of the rural environment (Policy EEP23, Policy EEP24, Policy EEP28, Policy EEP29, Objective EE063 and Objective EE078).

Additionally, the submission notes that the EIAR was flawed in chapters Soils & Lands, Population & HH, Material Assets, and Biodiversity in respect of their assessment of the proposed substation, road and compound on Mr. Bell's lands at Bremore.

The submission also claims that it does not accord with Government policies in respect of the CAP (Climate Action Plan)

Response to Issue Raised

1. Fingal County Development Plan- Material Contravention

Section 2.3.5.2 of Chapter 2 (Policy Context & Need for the Project) in Volume 2 of the EIAR presents how the Proposed Development has considered the objectives of the Fingal Development Plan.

In specific response to those policies identified as being in material contravention (Policy EEP23, Policy EEP24, Policy EEP28, Policy EEP29, Objective EE063 and Objective EE078), the Applicant notes that the proposed substation, essential for the electrification of the Northern Line as part of DART+ Coastal North, aligns with the principles of balanced development as outlined in the cited policies. While these policies aim to protect rural landscapes and agricultural land, they also acknowledge the importance of supporting economic opportunities and infrastructure development. Below is a detailed response to each policy cited, confirming there is no material contravention:

Policy EEP23 - Rural Economy

This policy highlights the need to support rural economies and maximise opportunities in emerging sectors, including renewable energy. The electrification of the railway line is a critical step toward a sustainable and low-carbon public transport system, aligning with the renewable energy goals implicit in the policy. The substation will facilitate the reduction of carbon emissions, which benefits both urban and rural areas, enhancing the overall rural economy by improving connectivity and sustainability.

Policy EEP24 - Protecting the Rural Landscape and Natural Heritage

The substation's design and location will incorporate mitigation measures to minimise its visual and environmental impact, balancing the protection of the landscape with the need for infrastructure to promote economic and social benefits. This development supports rural life by improving accessibility and sustainable mobility, indirectly benefiting tourism and rural economic activities.

Objective EE063 -Sustainable Agricultural Practices

The policy specifically encourages “*development of environmentally sustainable agricultural practices*” which the development is not in contravention of. Measures will be taken to protect nearby watercourses, wildlife habitats, and areas of ecological importance.

Policy EEP28 -Agriculture

While safeguarding the agricultural identity of North Fingal is a priority, this policy does not preclude essential infrastructural developments that enhance broader economic sustainability.

The substation's strategic placement ensures minimal disruption to agricultural activities, maintaining the rural character of the area while supporting Fingal's transition to more sustainable transport systems.

Policy EEP29- Regenerative Farming and Community Support

This policy encourages sustainable farming practices and community-based initiatives. The electrification of the railway line contributes to environmental sustainability by reducing reliance on fossil fuels. Such progress indirectly supports regenerative farming by encouraging a cleaner and more sustainable environment in rural areas.

Objective EE078 - Protection of Agricultural Lands

The proposed substation has been carefully sited to minimise any irreversible impact on agricultural lands. Comprehensive planning and environmental assessments have ensured that the development will not compromise the commercial viability of surrounding agricultural land.

The substation is a critical component of the DART+ Coastal North Project, a significant step in promoting sustainable transport. Its development adheres to the principles of balanced and sustainable growth as reflected in the cited policies. While the need to protect High Amenity lands is acknowledged, this Project exemplifies a carefully considered approach to integrating essential infrastructure within the rural context, supporting both local and national goals for sustainability and economic development. This balanced perspective highlights that the Proposed Development is not in material contravention of the policies but rather complements their overarching objectives.

Chapter 16 (Material Assets: Agricultural Properties) of the EIAR has undertaken an assessment of the potential impacts from the Proposed Development on Mr. Bells Property. The construction phase impact was assessed as not significant. The operational phase impact was also assessed as not significant.

2. EIAR Assessment

The Applicant has prepared a robust and thorough Environmental Impact Assessment Report (EIAR) in accordance with relevant legislation and best practice guidance including the EPA Guidelines on the information to be contained in Environmental Impact Assessment Reports (2022). Section 1.7.1. of Chapter 1 (Introduction) in Volume 2 of the EIAR presents the guidelines that informed the preparation of the EIAR. Further topic specific guidance is noted in the relevant chapters of the EIAR.

All of the individual specialist assessment chapters, including those noted in the submission have been prepared by competent experts, experienced professionals whose credentials and experience are presented in Chapter 1 Introduction of the EIAR (see Section 1.11, Table 1-3). All these specialist assessments have been prepared in full accordance with best practice guidance and standard methodologies, as set out within the chapters.

The assessments consider all aspects of the Proposed Development, including the proposed substation at Balbriggan, located on the subject lands and also consider all phases of the development including the construction and operational phases.

3. Climate Action Plan

Section 2.3.3.7 of Chapter 2 (Policy Context & Need for the Project) in Volume 2 of the EIAR presents how the Proposed Development aligns with the Climate Action Plan.

The DART+ Coastal North Project will be in compliance with, and will contribute towards, the targets identified in the Climate Action Plan. It will help reduce GHG emissions by:

- the provision of a more efficient public transport route, thereby encouraging a modal shift towards public transportation; and
- It will become part of the electrified rail network in Ireland.

The DART+ Coastal North Project is part of the DART+ Programme which is identified as a specific action in the Climate Action Plan.

7. Summary of Issue Raised

The submission notes that there will be an adverse impact on soils should a substation be built on lands that have been sustainably farmed by Mr. Bell. The submission notes the potential for the release of sequestered carbon in this regard.

Response to Issue Raised

The Applicant has fully considered the potential for adverse impacts on soils in respect of the Proposed Development.

An assessment of the loss and damage of topsoil has been undertaken as part of Chapter 9 (Land and Soils) of the EIAR. Section 9.7.2.3.1 describes the potential effects of the Proposed Development relating to the loss and/or damage of topsoil.

Topsoil is a non-renewable resource which if removed or damaged can result in a permanent irreversible negative effect. There are a number of ways this could happen:

- There is the potential for materials on site to be spilled resulting in pollution of the topsoil;
- These excavated soil materials will be stockpiled using appropriate methods to minimise the effects of weathering. Materials that are stockpiled incorrectly can be exposed to erosion and weathering which reduces the quality of the resource;
- Excavators in areas of unknown contaminated ground for the construction works may mobilise pollution contained in the soils into the nearby topsoils;

- Permanent damage of topsoil through waterlogging and erosion. This would be due to the trafficking of plant, regrading of slopes and storage of materials in areas not intended to be paved as part of the Proposed Development; and
- Excavation and disposal to topsoil instead of its reuse or reinstatement.

It is expected that topsoil will be encountered and excavated along Zone C of the Proposed Development, including at the proposed substation location Mr Bell is referring to in Balbriggan. Topsoil may be stripped and temporarily stored separately at designated excavated material storage areas or as close as possible to the excavation. Where topsoil is stripped to accommodate the works, all of the above effects have the potential to occur at these locations.

The magnitude of these impacts of the Proposed Development on the topsoil is small adverse as it results in a permanent irreversible loss of a small proportion of locally high fertility topsoil and/or a high proportion of locally low fertility topsoil within the study area. As the topsoil is of high importance the resulting significance of this permanent small adverse impact is moderate/slight.

Mitigation measures relating to the loss or damage of topsoil are detailed in Section 9.8.1.1 of the EIAR and includes the following:

- Excavated topsoil will be stockpiled by the appointed contractor using appropriate methods to minimise the effects of weathering. Care will be taken in reworking this material to minimise dust generation, groundwater infiltration and generation of runoff.
- All topsoils or subsoils shall be assessed for reuse within the Proposed Development by the appointed contractor ensuring the appropriate handling, processing, and segregation of the material. Where practical the removal of topsoil from the Proposed Development will be avoided. All earthworks will be undertaken in accordance with project-specific earthworks specifications ensuring that all excavated material and imported material is classified using the same methodology to allow maximum opportunity for the reuse of materials on site.

As outlined in Section 9.9 Residual Effects (Table 9.27), the resultant post-mitigation magnitude of the loss or damage of topsoil effect, once mitigation measures have been adopted, is considered negligible. The resultant post-mitigation significance is assessed to be imperceptible once appropriate mitigation measures have been implemented.

In addition, the assessment of potential climate effects during the construction phase considers the excavation of material at all locations including at the substation, refer to Chapter 13 (Climate), Section 13.5.1.2 for further information.

The submission makes specific reference to the sustainable farming practices of Mr. Bell. In this regard the Applicant notes that in Appendix A16.1 Reference No 40(Mr. Bells lands) is

described as a medium sensitivity tillage land parcel. The enterprise is described based on visual assessment and examination of aerial photography.

The sensitivity is assessed according to professional judgement and the criteria set out in Section 16.3.1 Evaluation of Baseline Sensitivity, Volume 2 of the EIAR. In the case of land parcel reference No 40 this assessment is based on the farm enterprise which is tillage. The farm enterprise is confirmed as tillage in Section 4.3 of Mr Bell's submission. The author recognises that within the tillage enterprise there are many variations for producing crops, for example, organic production and minimum till. Mr Bell's submission states that his production system involves the use of organic manures such as mushroom compost, strip tilling to establish crops and using cover crops to benefit soil structure, reduce fuel inputs and improve the organic matter in the soil. These practices are not referred to specifically in the EIAR because the EIAR focuses on the primary farm enterprise, which in this case is a tillage farm.

The move towards more sustainable farming practices such as use of organic manures and catch cropping is widespread and does not in the opinion of the competent expert (Chapter 16: Material Assets: Agricultural Properties) affect the sensitivity categorisation. For example, an organic tillage farm (which it could be argued is even more sustainable than the production system on Mr Bell's farm) does not have a higher sensitivity categorisation. The sensitivity is based on how infrastructural developments might affect the farming practices on the retained lands following construction. For example, where land is severed the movement of dairy cows from the parlour to the paddocks could be impeded and this activity occurs 4 times daily, thus restricting the enterprise and therefore the dairy enterprise is categorised as having a high sensitivity. In general, the movement of tillage machinery and growing of tillage crops can continue without the same level of disruption, in a similar situation, thus the tillage enterprise is categorised as having medium sensitivity. The Applicant recognises that there are unique management practices of individual tillage farms but based on the professional opinion of the competent expert, these individual practices do not change the sensitivity of the farm.

To that end the assessment of impact is as detailed in the EIAR (Chapter 16) and in Point 1 above.

8. Summary of Issue Raised

In respect of the AA & NIS, the submission notes that the Applicant's wintering surveys have not captured the wintering activity of curlews, terns and gulls, all of which are protected species on Mr Bell's farmlands. The submission notes that the Applicants have not "*served Mr. Bell's lands, unlike the NPWS ranger, it seems incredulous to us that such a statement would be made in their Appropriate Assessment/NIS.*"

The submission notes that the impact on biodiversity on Mr. Bell's land has not been assessed.

Response to Issue Raised

Wintering bird surveys were undertaken in respect of the Proposed Development. The survey methodology was based on the standard Bird Monitoring Methods - *A Manual of Techniques for Key UK Species* (Gilbert *et al.*, 1998).

Given the length of the Proposed Development, the focus of the wintering bird surveys was to capture known areas of sensitivity immediately intersected by or running alongside the rail corridor. Thereafter, the focus of the wintering bird surveys included areas that contained suitable habitat such as short sward amenity grassland and wetland habitats. It is acknowledged that wintering bird surveys weren't carried out within this specific location, as it is typically winter stubble, and it is noted that this location was not an IWeBS survey location, as shown on <https://irishwetlandbirdssurvey.ie/>.

However, lands approximately 300m south of the proposed substation were subject to winter bird surveys, based on professional ornithological judgment, owing to the high value habitat for brent geese and other wintering bird species, in this area, i.e. short sward amenity grassland. Whilst it is acknowledged that wintering bird species may use arable lands in the winter for foraging, *ex-situ* foraging sites e.g. inland sites used preferentially by wintering birds is often short grassland swards rather than stubble.

Furthermore, given that the proposed boundary of the substation is along the edges of the field, it is considered unlikely that impacts on foraging wintering birds would result in an adverse effect on the integrity of European sites or on SCI and non-SCI bird species. This is due to the predator avoidance technique that wetland and wildfowl bird species use, by foraging mainly in the centre of fields, away from hedgerows. The remaining central habitat in the field would remain suitable for wintering bird species, and the abundance of surrounding suitable habitat would ensure, that with the full implementation of the mitigation measures described in the EIAR biodiversity chapter and NIS as appropriate, that there is no significant impact on local bird species, either breeding or wintering birds.

9. Summary of Issue Raised

In respect of potential alternatives, the submission notes that the Project team has dismissed other suitable options. It notes that the preferred option was identified using inadequate and incomplete information rendering the options assessment fundamentally flawed.

Response to Issue Raised

Chapter 3 Alternatives of the EIAR sets out the options selection process and documents how the preferred option for the DART+ Coastal North Project was selected.

The methodology used as part of the options selection process is presented in Section 3.3.4 in Chapter 3 (alternatives) in Volume 2 of the EIAR. The appraisal method applied was based on the Guidelines on a Common Appraisal Framework for Transport Projects and Programmes' (CAF) published by the Department of Transport, Tourism, and Sport (DTTAS),

March 2016 (updated 2020), TII's Project Management Guidelines (TII PMG 2019) and the NTA's Project Approval Guidelines 2020. This methodology is consistent with other NTA projects.

Section 3.5.2.5 presents the three options that were considered for the location of the Balbriggan substation. All three options passed preliminary sifting and were taken forward to a Multi Criteria Assessment (MCA).

Option 3 (Proposed Development option) was identified as the Preferred Option. The basis for the selection of Option 3 is as follows:

- **Economy:** Options 1 and 2 have some comparative advantage as the length of access road and new highway connection in Option 3 has greater associated capital cost.
- **Environment:** Options 2 and 3 have comparative advantage since option 2 has significant comparative advantages from Geology and Soils, and Agricultural perspectives and Option 3 has significant comparative advantages from Landscape and Visual Quality, Noise and Vibration and Archaeology, Architectural and Cultural Heritage perspectives.
- **Accessibility & Social Inclusion and Physical Activity:** all options are comparable.
- **Integration:** Option 3 has comparative advantage from a land use perspective as Options 1 and 2 are encompassed by the Part XI approval for a recreational park.

It is also noted that Option 3 is located on the northern periphery of the ideal location from the power study, and any locations further north will have an adverse effect on the power demand for the new electrification.

5.3.3 SB0022 – Cairn Homes Properties Ltd.

Representative: Declan Brassil & Company Ltd.

Submission Location – Donabate

1. Summary of Issue Raised

The submission notes, in section 2 of the submitted observations, some inconsistency in the Railway Order documents that requires further clarification to assess impacts on the landowner accurately.

Response to Issue Raised

The Applicant has reviewed the Railway Order application and identified a typographical error in the Works Layout references, which were incorrectly listed as 12/1 and 12/2. The correct reference should be 11/2, and the Applicant now seeks to rectify this inadvertent error.

Regarding the substance of the submission, it is noted that the proposed works in this area include the underground diversion of two existing overhead medium-voltage (MV) lines to enable the electrification of the railway. These lines, which currently cross the railway, will be re-routed via the R126 Bridge (OBB32A), as detailed in Chapter 5 of the Construction Strategy in the EIAR, particularly Section 5.6.12.1 and Image 5-65 (excerpt included below).

Overhead line - South of Donabate (UG-DV3)

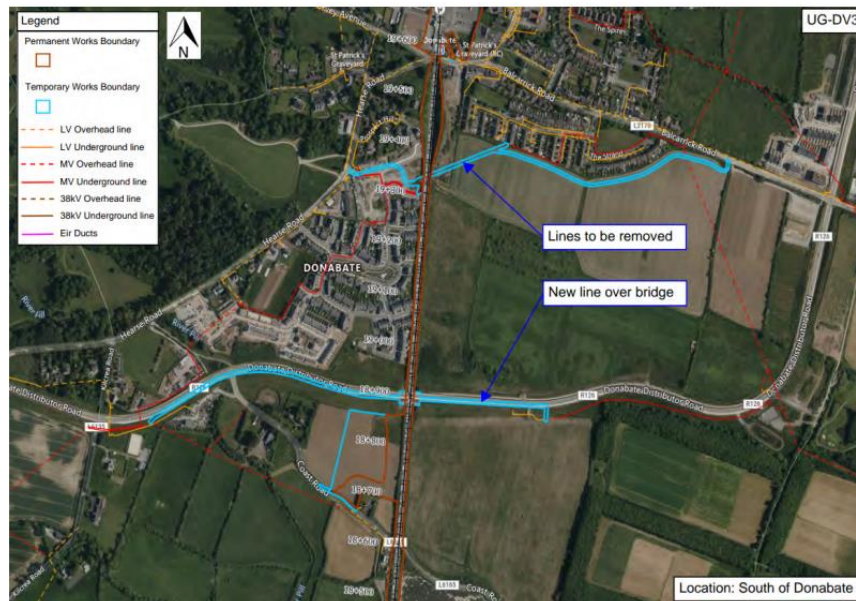


Image 5-65 UG-DV3 – OBB32A South of Donabate (Ch. 19,331)

The existing line that crosses the railway in this location is planned to be diverted along the R126 over OBB32A to the south. As shown in the image, work areas and access routes have been allocated both for the diversion and the removal of the existing line. The existing field accesses would be used to access the agricultural land areas. Some traffic management will be required on the R126 to facilitate the works, likely reducing it to a single lane for several weeks.

Figure 13 – Excerpt from Chapter 5 of the Construction Strategy in the EIAR - Image 5-65

The diversion of the existing overhead MV line is a critical component of the DART+ Coastal North Project, as it facilitates railway electrification.

Schedules DCN.5015.T.7(A), DCN.5015.T.2(A), and DCN.5015.4T.2(A) relate solely to the decommissioning and removal of the existing overhead MV power line, with no future works or access requirements anticipated (referenced as 11.14 on Works Layout Plan 11/2) once the works are complete. These works are essential to support railway electrification. Extracts from Property Plan 15 and Works Layout Plan 11/2 are provided below.

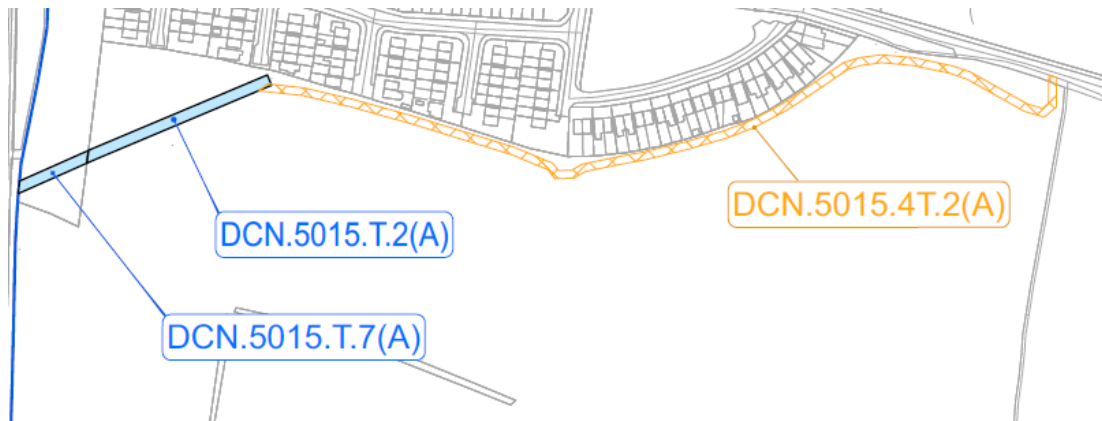


Figure 14 – Excerpt from Property Plan 15

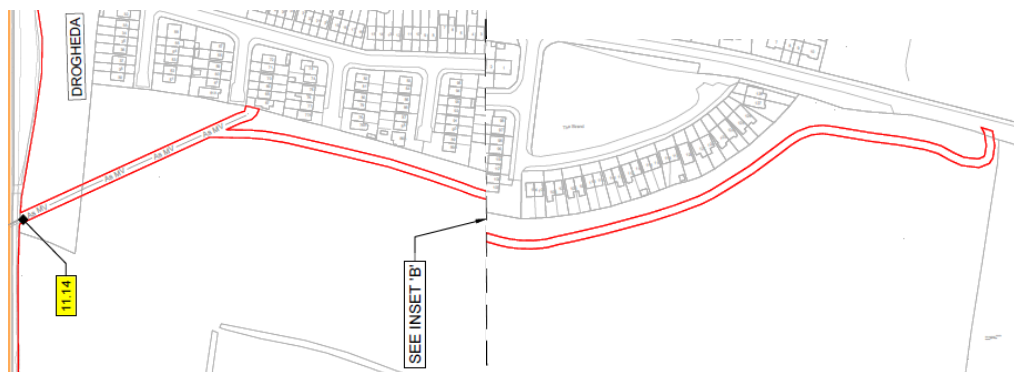


Figure 15 – Excerpt from Works Layout Plan 11/2

Schedules DCN.5015.T1(A) and DCN.5015.4P.1(A) relate to the connection to the ESB network for the diverted line and included the application of a buffer zone around the proposed MV underground diversion (referenced as 11.13 on Works Layout Plan 11/2). These schedules provide the utility company (ESB) with a permanent wayleave to maintain their infrastructure at this location, based on information from the Utility Records. Relevant extracts from Property Plan 15 and Works Layout Plan 11/2 are also included below.

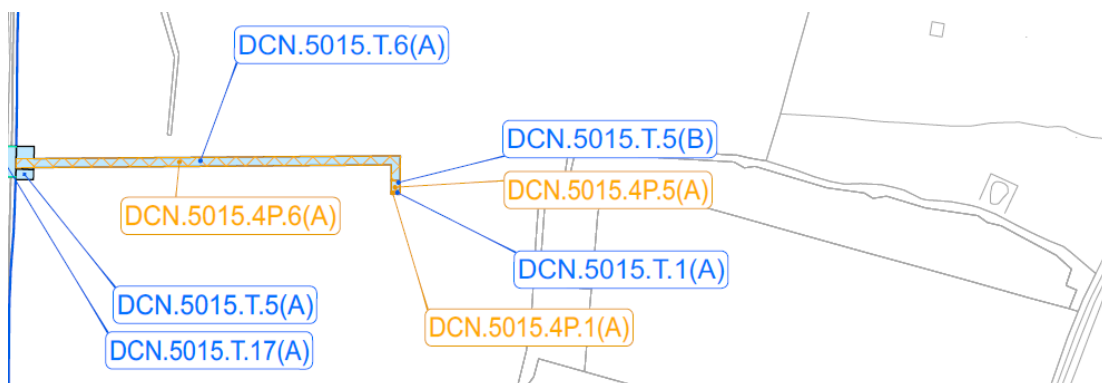


Figure 16 – Excerpt from Property Plan 15

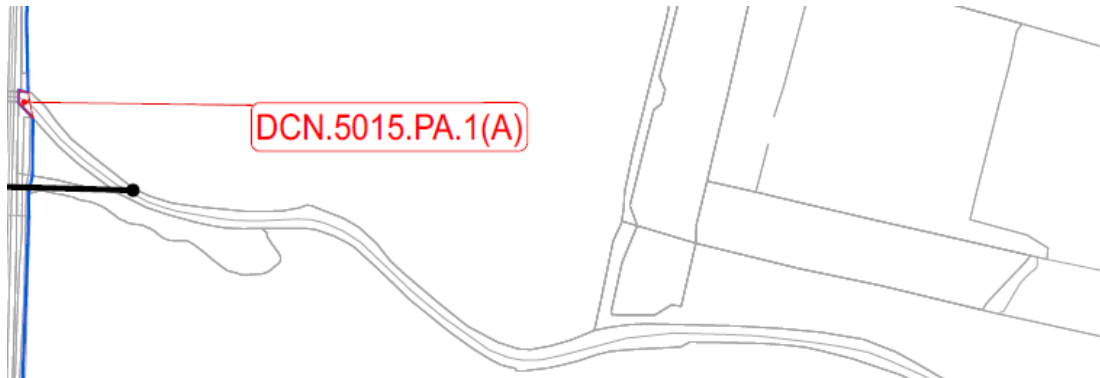


Figure 19 – Excerpt from Schedule DCN.5015.PA.1(A)

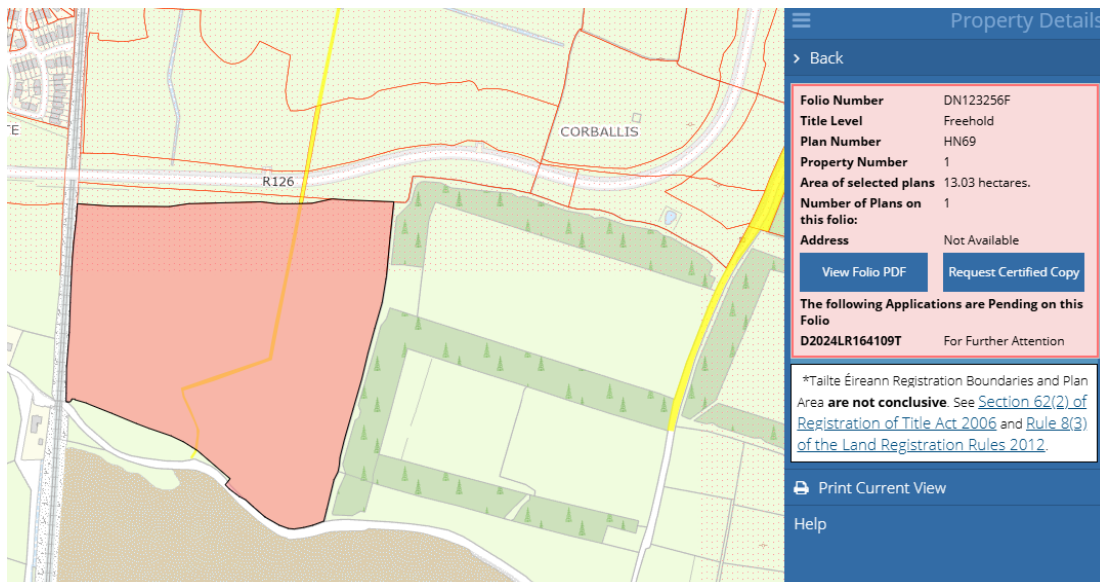


Figure 20 - Boundaries of LPID 331 as shown on Land Direct

It is acknowledged that ownership of the land associated with Schedule DCN.5015.PA.1(A) (airspace for the OHLE wire) has been transferred to Fingal County Council. Further discussions between Fingal County Council and the DART+ Coastal North team will be arranged to agree on the proposals for this location.

2. Summary of Issue Raised

The observer notes that the proposed permanent and temporary easements conflict with approved residential plans and the Linear Park mandated by the Donabate Local Area Plan.

Response to Issue Raised

The Applicant notes that the works relating to the landowner relate solely to the decommissioning and removal of the existing overhead MV power line, with no future works or access requirements anticipated (Schedules DCN.5015.T.7(A), DCN.5015.T.2(A), and

DCN.5015.4T.2(A)). The Applicant recognises the importance of aligning the medium-voltage (MV) line diversions with the approved LRD Development and notes that the response provided under Point 1 above will support this objective. It is acknowledged that the existing overhead MV line crosses the Proposed Development site, and development on this site—granted planning permission in November 2023—will also require the MV line to be diverted underground. The Applicant is committed to collaborating with Cairn Homes (CH) and working collectively with ESB to facilitate both the DART+ Project and the associated development plans.

5.3.4 SB0023 – Carmel Dowling

Representative: Sheehan Planning

Submission Location – Hackettstown, Skerries.

1. Summary of Issue Raised

The submission raises concerns about the disproportionate impact of compulsory purchase on private property rights, particularly regarding the acquisition of lands directly adjoining residential properties, at Skerries South. The relevant lands referenced in the CPO/Railway Order documentation are shown on plan no. Server Map Plan no. DCN-SM-005555-5022) as proposed to be:

1. permanently acquired (Ref. DCN.5022.P.4(A));
2. temporarily acquired (Ref. DCN.5022. T.4(A);
3. and where a temporary right of way is to be acquired (Ref. DCN.5022.4T.4(A).

The submission contests that the amount of land proposed for acquisition exceeds what was explained to the landowners by agents and/or servants of CIE prior to the submission of the application for the Railway Order, making it disproportionate to the Project's requirements. Furthermore, the submission notes that the landowners are of the opinion that the extent of land take subject to compulsory purchase/acquisition is excessive.

Response to Issue Raised

With regards to prior consultation with the submitter, the Applicant has worked hard to communicate widely and clearly with the public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route. The Project design evolved throughout the early design stage. This meant that additional potentially impacted landowners / occupiers were identified as the Project design progressed. The Applicant attempted to identify and notify potentially impacted landowners / occupiers as soon as the need for land acquisition at their property was identified. In relation to this submission, the lands were identified as lying within the Project boundary at PC2 as part of the Preferred Option. Property owners' names have been identified via Property Registration Authority of Ireland (PRAI) searches.

The Project team has engaged directly with these property owners since it became apparent that lands registered to them would be impacted by the Project boundary. Initially, as part of a wider mail-out to all properties in the Project area, a leaflet was distributed to this property at the start of PC1 in Q3 2022. A letter and leaflet were sent to the landowners following identification of substation locations as part of PC2 documentation in Q2 2023, notifying them that their property was within the extents of the Project boundary. Prior to this notification there had been consultation with the landowners in relation to permission to carry out environmental surveys on their lands.

A summary of key communications is presented below to demonstrate the efforts to engage with the landowner:

- 2023.05.25: Initial landowner consultation meeting to discuss PC2 proposals. The meeting led to some design revisions.
- 2023.09.15: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some further design revisions.
- 2023.10.02: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some final design revisions.
- 2023.10.20: Email containing revised layout sent to all members of the Dowling Family relevant to the registered lands.
- 2023.20.26: Email from Carmel Dowling to DART+ Coastal North noting agreement with the design proposed in email sent on 2023.10.20.

Further to the above, some additional email correspondences and several design iterations, such as those described in the Chapter 3 Alternatives of the EIAR, have helped move the consultation along to a point where approval in principle was agreed with the landowners. Some email and telephone correspondences in relation to survey access requests has also taken place during the design development.

The Applicant does note that the registered owners from available PRAI data were listed as Kevin Dowling and Carmel Dowling and the key communications as outlined above were with same. Following the Railway Order application submission, the Applicant was informed by Mary MacLoughlin and Teresa Dowling that they were also joint owners. Consequently, a notification letter with the relevant accompanying RO documentation extracts were issued to both of these individuals as well.

Based on the series of consultations with the property owners as described above the following concerns were addressed through design developments:

- Removal of shared access of the existing farm access as this was not acceptable to the landowners;
- Positioning the substation as far as reasonably practicable in the northwest corner as this was preferable to the landowners;
- At the request of the landowners, including resultant sterilised land in the northwest corner in the CPO.

As outlined on the Works Layout Plan No.15, a new junction is proposed from Golf Links Road (15.04). The temporary access (15.05) is required to construct this permanent access. The temporary access will cease to be used once the construction of the permanent access is complete. The permanent access will be used to construct the Skerries South Substation.

Initially, a single permanent access with shared rights of way was proposed. However, following consultation with the property owners, it was made clear that a shared access proposal was not acceptable to them, so separate access arrangements needed to be identified. The option of constructing the proposed permanent access without the need for a supplementary temporary access was also considered. However, this option was ruled out based on the significant impacts that the required construction traffic management (including road closures) would have had on the wider area and school traffic.

The temporary construction compound (15.03) is defined in the southwest corner by the proposed permanent compound (15.02) fence line and associated earthworks, which are to be maintained by the Applicant, as presented in the South Skerries Substation Site Plan (D+WP56-ARP-P4-NL-DR-RO-000810).

In the northeast, due to the level difference between the site and the road, a new embankment is required to facilitate the new access road. It is proposed to provide a mix of vegetation along the northeast embankment as screening to the adjacent property. In the northwest of the site the substation has been placed as far north as possible to address the property owner's feedback as described above, while ensuring the existing heritage structure is protected and maintained.

The remaining triangle of land in the northeast corner (approx. 600m²) was requested by the Applicant to be included in the CPO as the size and shape of the remaining land was no longer suitable for agricultural use.

The Applicant has therefore ensured that the extents of land included in the CPO are the minimum necessary to accommodate the works required for the DART+ Coastal North Project and mitigate impacts on the landowner.

2. Summary of Issue Raised

The submission questions the compatibility of the proposed substation and associated developments with the "Green Belt" (GB) zoning objectives of the Fingal County Development Plan, arguing that they contravene planning guidelines. The submission questions whether the proposed substation at Skerries South, and associated access point, fits with current land zoning objectives.

The submission suggests that the chosen site for the substation is not optimal, given the availability of alternative zoned lands where "Utility Installations" are permissible in principle, such as those particular lands located to the immediate north of the Skerries South substation, across Golf Links Road, zoned upon which 'Utility Installations are 'Permitted in Principle'.

The submission states that *“it is unclear if the development of a substation on ‘RA’ zoned lands to the immediate north of the impacted lands, upon which the development of ‘Utility Installations’ is ‘Permitted in Principle’, was considered as an alternative to the compulsory purchase of the affected landowners lands.”*

The submission notes that *“The lands which are to be permanently acquired are zoned as GB (green belt) in the Fingal County Development Plan 2023-2029 the object of which is to “Protect and provide for a Greenbelt”. The development of a large concrete/cement rendered metal roofed sub-station surrounded by fencing does not protect and provide for a greenbelt.”*

The submission questions how the Proposed Development fits with the current land zoning objectives of the area and notes *“the vision for greenbelt lands as set out in the Fingal County Development Plan to “Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.”*

The submission notes that *“It is also unclear how the development of a large utility installation building on green belt lands, immediately next to lands zoned for residential development, is consistent with the requirement in the zoning vision to ‘check unrestricted sprawl of urban areas’ and ‘to prevent countryside encroachment’.”*

Response to Issue Raised

A development materially contravenes a development plan if it fundamentally conflicts with the core objectives, policies, or zoning vision. However, plans also include flexibility to allow for projects of strategic importance or developments that meet overriding public need.

The proposed substation at Skerries South is an essential component of the DART+ Coastal North Project, a nationally significant infrastructure initiative aimed at delivering sustainable public transport and supporting Ireland’s climate action goals. While the submission raises concerns about compatibility with the Green Belt (GB) zoning objectives, it is important to recognise that the development does not fundamentally contravene the core objectives of the Fingal County Development Plan. Instead, it represents a carefully considered balance between strategic public need and the protection of sensitive landscapes.

The GB zoning aims to prevent urban sprawl, maintain rural-urban boundaries, and preserve attractive landscapes while supporting multifunctional benefits for both urban and rural communities. The substation does not contribute to urban encroachment or unrestricted

sprawl, as it is essential public infrastructure, not a residential or commercial development. Additionally, its limited footprint, combined with landscape screening and design mitigation, ensures that its impact is minimised. Its role in enabling low-carbon public transport aligns with broader climate action goals, delivering long-term benefits to both urban and rural areas.

The submission references RA-zoned lands to the north, where “Utility Installations” are permitted in principle, as a potential alternative. However, a comprehensive optioneering process was undertaken, assessing technical, environmental, and operational considerations. While RA-zoned sites were explored, they presented significant constraints, including residential proximity and grid connectivity challenges. The chosen site at Skerries South was determined to be the most operationally viable location, with fewer overall impacts and a clearer path to delivery.

It is acknowledged that Green Belt policies are designed to protect and enhance open landscapes, and developments of this nature must demonstrate their necessity. In this case, the strategic importance of the DART+ Coastal North Project provides a compelling justification. This infrastructure represents significant public benefit, supporting national climate goals, sustainable mobility, and economic development. Such developments, while not explicitly listed in GB zoning provisions, can be accommodated where the overriding public need is demonstrated, provided the impact is mitigated.

3. Summary of Issue Raised

Traffic safety. The submission notes that the landowners are highly concerned that the acquisition of the lands and the associated works and development will adversely affect traffic safety in the area.

The submission notes that the landowners consider that the Railway Order, if confirmed by the Board, would disproportionately impact on their property rights, will diminish the value of their property and is contrary to proper planning and sustainable development where it will give rise to traffic hazards and arguably contravenes the site's zoning objective.

Response to Issue Raised

1. Traffic Safety Concerns

The construction works for the South Skerries Substation and associated developments have been designed to minimise disruption to local traffic and ensure safety. As part of the design process a road safety audit stage 1 was carried out which ensured the forward visibility, geometry, gradients and associated sight lines are compliant with the requirements for the traffic speed. To that end, the Applicant has followed best practice guidance and standards throughout. The Applicant also notes that the substation will largely be unmanned during the operational phase, with predicted traffic use being limited to 1 vehicle approximately every 2 weeks to carry out an inspection.

The Construction Traffic Management Plan (CTMP) includes site-specific measures to manage traffic volumes, reduce potential hazards, and coordinate safely with local road users,

cyclists, and pedestrians. These measures will ensure safe ingress and egress from the substation site (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation,"). Controlled vehicle access, clear signage, and the scheduling of deliveries during off-peak hours are key strategies to mitigate traffic impacts.

2. Impact on Property Rights and Value

The South Skerries Substation location was selected following a comprehensive Multi-Criteria Analysis (MCA), which considered environmental, social, and economic factors. The Railway Order process incorporates stakeholder engagement to address potential impacts on property rights and value (Refer to Section 5.6.6, "Skerries South Substation," and Section 5.3.3, "Construction Compounds,"). The Applicant notes that subject to the confirmation of the Railway Order by An Bord Pleanála, compensation will be addressed in accordance with statute and Compulsory Purchase practice and procedure as and when statutory notices are served.

3. Alignment with Zoning Objectives

A response in respect of the site's zoning objective is given under Point 2 above. The Project complies with sustainable development principles and the site's zoning objectives, ensuring the substation's construction contributes to improved infrastructure while reducing environmental impacts (Refer to Section 5.1.2, "Sustainable Construction Principles," and Section 5.6.6, "Skerries South Substation,").

4. Traffic Hazard Mitigation

Risks related to traffic have been proactively addressed through site-specific strategies. The South Skerries Substation construction incorporates measures to safeguard local traffic conditions, including managing heavy goods vehicle (HGV) movements and temporary access routes (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," of the EIAR). The Railway Order application ensures these mitigations are embedded into the overall project plan to avoid creating traffic hazards during and after construction.

4. Summary of Issue Raised

The submission raises concerns over the suitability of the proposed access to serve the proposed Skerries South Substation, noting that *"if a temporary access point and temporary right of way is needed to avoid traffic hazards/disruption it would seem to follow that a permanent access point from the Golf Links Road would give rise to a traffic hazard. The site is therefore not suitable for the need envisaged"*

The submission also refers to potential traffic hazards from the proposed access points and rights of way, citing restricted sightlines and the proximity of St. Michael's School as contributing factors. Concerns are directed at both the permanent and temporary accesses proposed where the submission suggests sight lines are not acceptable.

Response to Issue Raised

The access design for the South Skerries Substation has been rigorously assessed and optimised to ensure safety, operational efficiency, and minimal community disruption. The temporary use of access 15.05 (as referenced on works layout plan 15) is a necessary and temporary measure to enable the safe construction of the permanent access at 15.04 while minimising impacts on the local area, including school traffic. These measures reflect the Project's commitment to addressing stakeholder concerns and adhering to best practices in traffic and safety management.

1. Design and Safety of Access Points

The design of the temporary and permanent access points for the South Skerries Substation has undergone a comprehensive assessment, including a Stage 1 Road Safety Audit, to ensure compliance with safety standards. This process evaluated critical factors such as forward visibility, traffic speeds, geometry, gradients, and sightlines to minimise potential hazards (Refer to Section 5.6.6, "Skerries South Substation," in the EIAR). The permanent access point at 15.04 is designed for very limited use, with traffic predicted to be approximately one vehicle every two weeks for routine inspections, ensuring minimal long-term impact on traffic safety and local roads.

2. Temporary and Permanent Access Points

A temporary access point at 15.05 is required to facilitate the safe and efficient construction of the permanent access at 15.04. The use of 15.05 will cease once the construction of the permanent access is complete (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," in the EIAR).

A permanent access point at 15.05 was initially proposed but ruled out following consultation with the property owner, who was unwilling to share rights of way. Constructing the permanent access at 15.04 without temporary reliance on 15.05 was also evaluated but was deemed not feasible due to potential for significant impacts on local traffic, including potential road closures and disruptions near St. Michael's School (Refer to Section 5.6.6, "Skerries South Substation," of the EIAR).

3. Proximity to St. Michael's School and Traffic Safety

The design has accounted for the proximity of St. Michael's School and implemented measures to mitigate potential risks. This includes restricting construction vehicle movements during school hours and providing clear signage to ensure safety for pedestrians and other road users (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," of the EIAR). The use of temporary access at 15.05 minimises traffic congestion and disruption near the school during construction, safeguarding the interests of the local community.

4. Traffic Hazard Mitigation

The chosen access arrangement, including temporary reliance on 15.05, reflects a carefully considered balance between operational feasibility, traffic safety, and community impact. The Construction Traffic Management Plan (CTMP) ensures safe traffic flow and minimal disruption during construction, while long-term use of the permanent access ensures negligible traffic risks following completion of works (Refer to Section 5.3.13, "Construction Traffic Management Plan," of the EIAR).

5. Summary of Issue Raised

The submission questions the need for the temporary right of way included in the Railway Order application documents, over the laneway located to the east of the proposed permanent access location. The views of the landowner are that the temporary right of way will serve to impede, for an unknown period of time, access from the dwelling to the field behind the dwelling. It is also unclear why the temporary right of way is needed where the lands to be permanently acquired directly adjoin the Golf Links Road, from which road permanent access to the proposed substation is proposed.

Response to Issue Raised

The temporary right of way is a necessary and strictly time-limited measure to facilitate the construction of the permanent access at South Skerries Substation. The anticipated duration of works in this location is 3–6 months, after which the temporary right of way will no longer be used. The Applicant remains committed to minimising disruption for the landowner and the local community and ensuring timely completion of the works.

1. Purpose and Necessity of the Temporary Right of Way

The temporary right of way over the laneway to the east of the proposed permanent access is essential to facilitate the construction of the permanent access point at 15.04 (as referenced on works layout plan 15). It enables construction vehicles and materials to safely and efficiently access the site without causing undue disruption to traffic on the Golf Links Road. This temporary arrangement is critical to minimising traffic hazards and avoiding significant road closures in the area (Refer to Section 5.6.6, "Skerries South Substation,").

2. Duration of Works in This Location

The construction works at the South Skerries Substation, including the creation of the permanent access, are anticipated to last approximately 3–6 months, depending on local site constraints, weather conditions, and the availability of resources (Refer to Section 5.6.6, "Skerries South Substation," of the EIAR). The temporary right of way will only be required during this construction period, after which it will no longer be utilised. Every effort will be made to complete the works efficiently and within the Projected timeline.

3. Minimising Impacts on Landowners

During the construction period, the Applicant will strive to maintain reasonable access for the landowner to their field behind the dwelling. Any necessary temporary adjustments to access will be communicated clearly and planned to minimise disruption. Stakeholder engagement remains a priority to ensure the landowner's concerns are addressed, including providing advanced notice of key construction activities (Refer to Section 5.3.13 of the EIAR, "Construction Traffic Management Plan,").

4. Justification for Temporary Right of Way Despite Adjoining Golf Links Road

While the permanent access point directly adjoins the Golf Links Road, constructing this access without temporary reliance on the laneway would require extensive road closures and significant traffic management measures. These disruptions would disproportionately affect local traffic, including residents and St. Michael's School traffic. The temporary right of way ensures a safer and more efficient construction process, balancing the operational requirements of the Project with the needs of the local community.

6. Summary of Issue Raised

The submission notes objection to the proposals on the basis that *"the acquisition of the land will further prevent the referenced landowners from developing the lands themselves. In this regard, there is a derelict lodge located on the lands that are to be acquired as part of Railway Order Application which was formerly in residential use. The compulsory purchase of the lodge and the demolition of the lodge and its replacement with a sub-station will prevent the current owners from refurbishing the lodge and bringing it back into use. Further while the lands are zoned GB various uses are nonetheless 'Permissible in Principle' as set out in the zoning matrix for GB lands in the Development Plan."*

Response to Issue Raised

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

5.3.5 SB0089 – Keith Ryan

Representative: n/a

Submission Location – Seapoint, Balbriggan.

1. Summary of Issue Raised

The submission notes that the area identified for temporary landtake on the Property Layout Plan impacts on the only access to their home.

Response to Issue Raised

The property referred to in the submission (DN254634F) is impacted by a temporary land acquisition (DCN.5027.T.25(A)) as per Server Map Plan No DCN-SM-017230-5027 in the Railway Order application.

The above referenced temporary land acquisition, in accordance with the Railway Order Book of Reference for the Proposed Development (Works No 17.09, 17.10 & 17.11) and Works Layout Plan No. 17, is proposed to facilitate decommissioning and removal of existing overhead low voltage power lines to accommodate the proposed railway electrification (including railway signalling and communications infrastructure as well as installation of overhead electrification equipment). The decommissioned power lines will be diverted through the installation of a new underground low voltage power line, along Seapoint Road) as per Works Layout Plan No. 17.

The Applicant will continue to engage with relevant stakeholders, and to liaise with ESB, in relation to the proposed undergrounding of LV overhead power lines along Seapoint Road, at approximate Chainage 35+400 to 35+950. It is, however, noted that ESB networks will be responsible for undertaking this work, as outlined in Chapter 5 of the EIAR documentation. The methodology for undertaking diversionary works, such as those outlined above, is contained in Section 5.3.4.4 of Chapter 5. It is expected that these roads will require traffic management for the duration of the works, likely several weeks.

Section 17.7.1.2 of Chapter 17 of the EIAR includes measures to mitigate the impact of the proposed Project on access to property during the construction phase and states *“Access will be maintained to all affected property as much as possible and if interruption is necessary, it will be pre-notified to the property owner / occupant and it will be restored without unreasonable delay. Traffic management measures will be put in place during construction where temporary or minor diversions are required. These measures are detailed within Volume 2, Chapter 6 Traffic and Transportation of this EIAR.”*

2. Summary of Issue Raised

The observer raises concerns for the health and safety of his family during the proposed ESB diversion works.

Response to Issue Raised

The Applicant acknowledges the concerns raised by the Observer in relation to Health and Safety.

Chapter 5 of the EIAR describes in detail the proposed construction strategy of the DART+ Coastal North Project. As part of the development of the Railway Order application, per Appendix A5.1 of the EIAR, a Construction Environmental Management Plan (CEMP) has been developed. This document forms the basis for ensuring all works are carried out in accordance with best practice methodologies with the protection of communities and the environment in mind.

The CEMP applies to all works associated with the Proposed Development. As a contractor has not yet been appointed, this CEMP will be further developed following selection of Contractors and before commencement of site works. The CEMP presents the approach and application of environmental management and mitigation measures for the Construction Phase of the Proposed Development. It aims to ensure that adverse effects from the Construction Phase of the Proposed Development, on the environment and the local communities, are avoided or minimised as far as reasonably practicable. It does not describe mitigation measures relating to the Operational Phase and any future decommissioning of the Proposed Development. These are provided in the mitigation sections of the EIAR Chapters in Volume 2 of the EIAR and are summarised in Chapter 27 (Summary of Mitigation and Monitoring Measures).

The CEMP provides the environmental management framework for the appointed Contractors and sub-contractors as they incorporate the mitigating principles to ensure that the work is carried out to reduce adverse effects on the environment. The construction management staff as well as contractors and sub-contractors' staff must comply with the requirements and constraints set out in the CEMP in developing the finalised CEMPs. The key environmental aspects associated with the construction of the DART+ Coastal North Project, the appropriate mitigation and monitoring controls, are identified in this CEMP and its supporting documentation. The implementation of the requirements of the CEMP will ensure that the Construction Phase of the Project is carried out in accordance with the commitments made by the Applicant in the Railway Order application process for the Proposed Development, and as required under the Railway Order. Once commenced, the CEMP is considered a living document that will be updated according to changing circumstances on the Project and to reflect current construction activities. The CEMP will be reviewed on an ongoing basis during the construction process and will include information on the review procedures.

3. Summary of Issue Raised

The submission raises concerns that the proposals potentially restrict access to the property for emergency services.

Response to Issue Raised

The proposed works relevant to the impacted property shall be carried out over a relatively brief time-period of one week and restriction to access will be minimised. A partial road closure is required to facilitate the works and access for emergency vehicles will be maintained throughout. In advance of any works taking place, the residents of the affected property will be consulted with by the Project Community Liaison Officer (CLO) to ensure they are aware of the details of the proposed works.

4. Summary of Issue Raised

The submission notes concern with the following aspects of the Draft Railway Order:

1. The articles of the draft Railway Order are extremely vague and worded in such a way to be essentially 'catch all' articles in favour of the Applicant.
2. The articles of the Railway Order propose to give the Applicant the power to alter existing surrounding infrastructure/buildings and/or to construct new infrastructure/building in private and/or public property.
3. Article 15 of the draft Railway Order aims to provide the Applicant with an excessive construction period of 10 years. This will have a significant impact to residents, the natural environment as well as property value.

Response to Issue Raised

The Applicant acknowledges the concerns raised and responds as follows:

1. The articles of the Draft Railway Order for the Proposed Development are written so as to ensure that all aspects of the Project proposals are described in a sufficient level of detail to avoid confusion. With respect to some elements of the proposals, such as the proposed ESB diversion to which this submission predominantly relates, the proposals are described both in text and supported by relevant Works Drawings to convey the detail of the proposals.
2. The Railway Order Application for the Proposed Development seeks to conduct as much of the proposed works within the extents of the Railway Corridor as possible. Where it has been necessary to include works outside of the Railway Corridor then the extent of impact has been kept to a minimum. Any proposed alterations to surrounding infrastructure/buildings and/or works on private and/or private property are proposed solely to achieve the stated project objectives with as little impact on surrounding environments as possible.
3. The Draft Railway Order is written to provide a 10yr period for the substantial completion of the DART+ Coastal North Project. The actual construction period is expected to be closer to 3years in duration, further to the Project securing all necessary approvals, funding, and completion of Design and Procurement requirements. As per the current Construction Programme, as outlined in Section 5.2 of Chapter 5 of the EIR, the DART+ Coastal North Project is expected to be completed circa Q4 2029.

5. Summary of Issue Raised

The submission notes an error in the “Third Schedule” of the RO documentation where reference is made to “Works Layout Drawing No 17/2”. The observer stated that this is an incorrect drawing reference.

Response to Issue Raised

The Applicant acknowledges this inadvertent error when referring to “Works Layout Drawing No 17/2”. The correct reference, relevant to the location of the submission, is “Works Layout Drawing No 17/1” and the Applicant now seeks to correct this.

6. Summary of Issue Raised

The submission notes that there is no information provided in relation to coordination with Fingal County Councils / NTA plans for Coast Way / Greenways and their plans for improvements to local areas which are overlapping with the scope outlined in the draft Railway Order 2024 documents. Further clarification is sought.

Response to Issue Raised

The Applicant notes that there has been significant consultation with all relevant Local Authorities throughout the design development of the Proposed Development and where project interfaces have been identified that the Project has taken all reasonable steps to ensure that any potential impact has been avoided or minimised wherever possible.

The coordination process included detailed consultation during the pre-application phase and non-statutory public consultations, as outlined in the Project’s consultation strategy. Fingal County Council’s plans for Coast Way and Greenways have been acknowledged, and the Project has sought to align its design with these initiatives wherever possible. The Applicant remains committed to working with Fingal County Council and the NTA to facilitate the delivery of complementary infrastructure improvements that support regional connectivity and sustainable mobility.

The Railway Order Planning Report highlights the importance of connectivity and active travel objectives outlined in the Fingal County Development Plan 2023-2029, which directly support sustainable transport initiatives such as the DART+ programme. Additionally, specific objectives for indicative cycle/pedestrian routes, such as those linking Baldoyle to Portmarnock Greenway and the Broadmeadow Way, have been considered in the Project’s design to ensure compatibility with these active travel routes. The Environmental Impact Assessment Report (EIAR) also includes a thorough assessment of cumulative effects and potential interfaces with other planned and existing projects (see Chapter 26 Cumulative Effects of the EIAR). This ensures that the combined impact of the DART+ Coastal North Project alongside local authority and NTA developments is fully understood and mitigated.

Further engagement with local authorities and the NTA has ensured a coordinated approach to align the DART+ Coastal North Project with existing and planned infrastructure improvements. The Applicant remains committed to ongoing collaboration with stakeholders to facilitate the delivery of integrated solutions that enhance regional connectivity, active travel infrastructure, and public transport accessibility.

5.3.6 SB0104 – Teresa Dowling

Representative: Sheehan Planning

Submission Location – Hackettstown, Skerries.

1. Summary of Issue Raised

The submission raises concerns about the disproportionate impact of compulsory purchase on private property rights, particularly regarding the acquisition of lands directly adjoining residential properties, at Skerries South. The relevant lands referenced in the CPO/Railway Order documentation are shown on plan no. Server Map Plan no. DCN-SM-005555-5022) as proposed to be:

1. permanently acquired (Ref. DCN.5022.P.4(A));
2. temporarily acquired (Ref. DCN.5022. T.4(A);
3. and where a temporary right of way is to be acquired (Ref. DCN.5022.4T.4(A).

The submission contests that the amount of land proposed for acquisition exceeds what was explained to the landowners by agents and/or servants of CIE prior to the submission of the application for the Railway Order, making it disproportionate to the Project's requirements. Furthermore, the submission notes that the landowners are of the opinion that the extent of land take subject to compulsory purchase/acquisition is excessive.

Response to Issue Raised

With regards to prior consultation with the submitter, the Applicant has worked hard to communicate widely and clearly with the public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route. The Project design evolved throughout the early design stage. This meant that additional potentially impacted landowners / occupiers were identified as the Project design progressed. The Applicant attempted to identify and notify potentially impacted landowners / occupiers as soon as the need for land acquisition at their property was identified. In relation to this submission, the lands were identified as lying within the Project boundary at PC2 as part of the Preferred Option. Property owners' names have been identified via Property Registration Authority of Ireland (PRAI) searches.

The Project team has engaged directly with these property owners since it became apparent that lands registered to them would be impacted by the Project boundary. Initially, as part of a

wider mail-out to all properties in the Project area, a leaflet was distributed to this property at the start of PC1 in Q3 2022. A letter and leaflet were sent to the landowners following identification of substation locations as part of PC2 documentation in Q2 2023, notifying them that their property was within the extents of the Project boundary. Prior to this notification there had been consultation with the landowners in relation to permission to carry out environmental surveys on their lands.

A summary of key communications is presented below to demonstrate the efforts to engage with the landowner:

- 2023.05.25: Initial landowner consultation meeting to discuss PC2 proposals. The meeting led to some design revisions.
- 2023.09.15: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some further design revisions.
- 2023.10.02: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some final design revisions.
- 2023.10.20: Email containing revised layout sent to all members of the Dowling Family relevant to the registered lands.
- 2023.10.26: Email from Carmel Dowling to DART+ Coastal North noting agreement with the design proposed in email sent on 2023.10.20.

Further to the above, some additional email correspondences and several design iterations, such as those described in the Chapter 3 Alternatives of the EIAR, have helped move the consultation along to a point where approval in principle was agreed with the landowners. Some email and telephone correspondences in relation to survey access requests has also taken place during the design development.

The Applicant does note that the registered owners from available PRAI data were listed as Kevin Dowling and Carmel Dowling and the key communications as outlined above were with same. Following the Railway Order application submission, the Applicant was informed by Mary MacLoughlin and Teresa Dowling that they were also joint owners. Consequently, a notification letter with the relevant accompanying RO documentation extracts were issued to both of these individuals as well.

Based on the series of consultations with the property owners as described above the following concerns were addressed through design developments:

- Removal of shared access of the existing farm access as this was not acceptable to the landowners;
- Positioning the substation as far as reasonably practicable in the northwest corner as this was preferable to the landowners;
- At the request of the landowners, including resultant sterilised land in the northwest corner in the CPO.

As outlined on the Works Layout Plan No.15, a new junction is proposed from Golf Links Road (15.04). The temporary access (15.05) is required to construct this permanent access. The

temporary access will cease to be used once the construction of the permanent access is complete. The permanent access will be used to construct the Skerries South Substation.

Initially, a single permanent access with shared rights of way was proposed. However, following consultation with the property owners, it was made clear that a shared access proposal was not acceptable to them, so separate access arrangements needed to be identified. The option of constructing the proposed permanent access without the need for a supplementary temporary access was also considered. However, this option was ruled out based on the significant impacts that the required construction traffic management (including road closures) would have had on the wider area and school traffic.

The temporary construction compound (15.03) is defined in the southwest corner by the proposed permanent compound (15.02) fence line and associated earthworks, which are to be maintained by the Applicant, as presented in the South Skerries Substation Site Plan (D+WP56-ARP-P4-NL-DR-RO-000810).

In the northeast, due to the level difference between the site and the road, a new embankment is required to facilitate the new access road. It is proposed to provide a mix of vegetation along the northeast embankment as screening to the adjacent property. In the northwest of the site the substation has been placed as far north as possible to address the property owner's feedback as described above, while ensuring the existing heritage structure is protected and maintained.

The remaining triangle of land in the northeast corner (approx. 600m²) was requested by the Applicant to be included in the CPO as the size and shape of the remaining land was no longer suitable for agricultural use.

The Applicant has therefore ensured that the extents of land included in the CPO are the minimum necessary to accommodate the works required for the DART+ Coastal North Project and mitigate impacts on the landowner.

2. Summary of Issue Raised

The submission questions the compatibility of the proposed substation and associated developments with the "Green Belt" (GB) zoning objectives of the Fingal County Development Plan, arguing that they contravene planning guidelines. The submission questions whether the proposed substation at Skerries South, and associated access point, fits with current land zoning objectives.

The submission suggests that the chosen site for the substation is not optimal, given the availability of alternative zoned lands where "Utility Installations" are permissible in principle, such as those particular lands located to the immediate north of the Skerries South substation, across Golf Links Road, zoned upon which 'Utility Installations are 'Permitted in Principle'.

The submission states that *"it is unclear if the development of a substation on 'RA' zoned lands to the immediate north of the impacted lands, upon which the development of 'Utility*

Installations' is 'Permitted in Principle', was considered as an alternative to the compulsory purchase of the affected landowners lands."

The submission notes that *"The lands which are to be permanently acquired are zoned as GB (green belt) in the Fingal County Development Plan 2023-2029 the object of which is to "Protect and provide for a Greenbelt". The development of a large concrete/cement rendered metal roofed sub-station surrounded by fencing does not protect and provide for a greenbelt."*

The submission questions how the Proposed Development fits with the current land zoning objectives of the area and notes *"the vision for greenbelt lands as set out in the Fingal County Development Plan to "Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas."*

The submission notes that *"It is also unclear how the development of a large utility installation building on green belt lands, immediately next to lands zoned for residential development, is consistent with the requirement in the zoning vision to 'check unrestricted sprawl of urban areas' and 'to prevent countryside encroachment'."*

Response to Issue Raised

A development materially contravenes a development plan if it fundamentally conflicts with the core objectives, policies, or zoning vision. However, plans also include flexibility to allow for projects of strategic importance or developments that meet overriding public need.

The proposed substation at Skerries South is an essential component of the DART+ Coastal North Project, a nationally significant infrastructure initiative aimed at delivering sustainable public transport and supporting Ireland's climate action goals. While the submission raises concerns about compatibility with the Green Belt (GB) zoning objectives, it is important to recognise that the development does not fundamentally contravene the core objectives of the Fingal County Development Plan. Instead, it represents a carefully considered balance between strategic public need and the protection of sensitive landscapes.

The GB zoning aims to prevent urban sprawl, maintain rural-urban boundaries, and preserve attractive landscapes while supporting multifunctional benefits for both urban and rural communities. The substation does not contribute to urban encroachment or unrestricted sprawl, as it is essential public infrastructure, not a residential or commercial development. Additionally, its limited footprint, combined with landscape screening and design mitigation,

ensures that its impact is minimised. Its role in enabling low-carbon public transport aligns with broader climate action goals, delivering long-term benefits to both urban and rural areas.

The submission references RA-zoned lands to the north, where “Utility Installations” are permitted in principle, as a potential alternative. However, a comprehensive optioneering process was undertaken, assessing technical, environmental, and operational considerations. While RA-zoned sites were explored, they presented significant constraints, including residential proximity and grid connectivity challenges. The chosen site at Skerries South was determined to be the most operationally viable location, with fewer overall impacts and a clearer path to delivery.

It is acknowledged that Green Belt policies are designed to protect and enhance open landscapes, and developments of this nature must demonstrate their necessity. In this case, the strategic importance of the DART+ Coastal North Project provides a compelling justification. This infrastructure represents significant public benefit, supporting national climate goals, sustainable mobility, and economic development. Such developments, while not explicitly listed in GB zoning provisions, can be accommodated where the overriding public need is demonstrated, provided the impact is mitigated.

3. Summary of Issue Raised

Traffic safety. The submission notes that the landowners are highly concerned that the acquisition of the lands and the associated works and development will adversely affect traffic safety in the area.

The submission notes that the landowners consider that the Railway Order, if confirmed by the Board, would disproportionately impact on their property rights, will diminish the value of their property and is contrary to proper planning and sustainable development where it will give rise to traffic hazards and arguably contravenes the site's zoning objective.

Response to Issue Raised

1. Traffic Safety Concerns

The construction works for the South Skerries Substation and associated developments have been designed to minimise disruption to local traffic and ensure safety. As part of the design process a road safety audit stage 1 was carried out which ensured the forward visibility, geometry, gradients and associated sight lines are compliant with the requirements for the traffic speed. To that end, the Applicant has followed best practice guidance and standards throughout. The Applicant also notes that the substation will largely be unmanned during the operational phase, with predicted traffic use being limited to 1 vehicle approximately every 2 weeks to carry out an inspection.

The Construction Traffic Management Plan (CTMP) includes site-specific measures to manage traffic volumes, reduce potential hazards, and coordinate safely with local road users, cyclists, and pedestrians. These measures will ensure safe ingress and egress from the substation site (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section

5.6.6, "Skerries South Substation,"). Controlled vehicle access, clear signage, and the scheduling of deliveries during off-peak hours are key strategies to mitigate traffic impacts.

2. Impact on Property Rights and Value

The South Skerries Substation location was selected following a comprehensive Multi-Criteria Analysis (MCA), which considered environmental, social, and economic factors. The Railway Order process incorporates stakeholder engagement to address potential impacts on property rights and value (Refer to Section 5.6.6, "Skerries South Substation," and Section 5.3.3, "Construction Compounds,"). The Applicant notes that subject to the confirmation of the Railway Order by An Bord Pleanála, compensation will be addressed in accordance with statute and Compulsory Purchase practice and procedure as and when statutory notices are served.

3. Alignment with Zoning Objectives

A response in respect of the site's zoning objective is given under Point 2 above. The Project complies with sustainable development principles and the site's zoning objectives, ensuring the substation's construction contributes to improved infrastructure while reducing environmental impacts (Refer to Section 5.1.2, "Sustainable Construction Principles," and Section 5.6.6, "Skerries South Substation,").

4. Traffic Hazard Mitigation

Risks related to traffic have been proactively addressed through site-specific strategies. The South Skerries Substation construction incorporates measures to safeguard local traffic conditions, including managing heavy goods vehicle (HGV) movements and temporary access routes (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," of the EIAR). The Railway Order application ensures these mitigations are embedded into the overall project plan to avoid creating traffic hazards during and after construction.

4. Summary of Issue Raised

The submission raises concerns over the suitability of the proposed access to serve the proposed Skerries South Substation, noting that *"if a temporary access point and temporary right of way is needed to avoid traffic hazards/disruption it would seem to follow that a permanent access point from the Golf Links Road would give rise to a traffic hazard. The site is therefore not suitable for the need envisaged"*

The submission also refers to potential traffic hazards from the proposed access points and rights of way, citing restricted sightlines and the proximity of St. Michael's School as contributing factors. Concerns are directed at both the permanent and temporary accesses proposed where the submission suggests sight lines are not acceptable.

Response to Issue Raised

The access design for the South Skerries Substation has been rigorously assessed and optimised to ensure safety, operational efficiency, and minimal community disruption. The temporary use of access 15.05 (as referenced on works layout plan 15) is a necessary and temporary measure to enable the safe construction of the permanent access at 15.04 while minimising impacts on the local area, including school traffic. These measures reflect the Project's commitment to addressing stakeholder concerns and adhering to best practices in traffic and safety management.

1. Design and Safety of Access Points

The design of the temporary and permanent access points for the South Skerries Substation has undergone a comprehensive assessment, including a Stage 1 Road Safety Audit, to ensure compliance with safety standards. This process evaluated critical factors such as forward visibility, traffic speeds, geometry, gradients, and sightlines to minimise potential hazards (Refer to Section 5.6.6, "Skerries South Substation," in the EIAR). The permanent access point at 15.04 is designed for very limited use, with traffic predicted to be approximately one vehicle every two weeks for routine inspections, ensuring minimal long-term impact on traffic safety and local roads.

2. Temporary and Permanent Access Points

A temporary access point at 15.05 is required to facilitate the safe and efficient construction of the permanent access at 15.04. The use of 15.05 will cease once the construction of the permanent access is complete (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," in the EIAR).

A permanent access point at 15.05 was initially proposed but ruled out following consultation with the property owner, who was unwilling to share rights of way. Constructing the permanent access at 15.04 without temporary reliance on 15.05 was also evaluated but was deemed not feasible due to potential for significant impacts on local traffic, including potential road closures and disruptions near St. Michael's School (Refer to Section 5.6.6, "Skerries South Substation," of the EIAR).

3. Proximity to St. Michael's School and Traffic Safety

The design has accounted for the proximity of St. Michael's School and implemented measures to mitigate potential risks. This includes restricting construction vehicle movements during school hours and providing clear signage to ensure safety for pedestrians and other road users (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," of the EIAR). The use of temporary access at 15.05 minimises traffic congestion and disruption near the school during construction, safeguarding the interests of the local community.

4. Traffic Hazard Mitigation

The chosen access arrangement, including temporary reliance on 15.05, reflects a carefully considered balance between operational feasibility, traffic safety, and community impact. The Construction Traffic Management Plan (CTMP) ensures safe traffic flow and minimal disruption during construction, while long-term use of the permanent access ensures negligible traffic risks following completion of works (Refer to Section 5.3.13, "Construction Traffic Management Plan," of the EIAR).

5. Summary of Issue Raised

The submission questions the need for the temporary right of way included in the Railway Order application documents, over the laneway located to the east of the proposed permanent access location. The views of the landowner are that the temporary right of way will serve to impede, for an unknown period of time, access from the dwelling to the field behind the dwelling. It is also unclear why the temporary right of way is needed where the lands to be permanently acquired directly adjoin the Golf Links Road, from which road permanent access to the proposed substation is proposed.

Response to Issue Raised

The temporary right of way is a necessary and strictly time-limited measure to facilitate the construction of the permanent access at South Skerries Substation. The anticipated duration of works in this location is 3–6 months, after which the temporary right of way will no longer be used. The Applicant remains committed to minimising disruption for the landowner and the local community and ensuring timely completion of the works.

1. Purpose and Necessity of the Temporary Right of Way

The temporary right of way over the laneway to the east of the proposed permanent access is essential to facilitate the construction of the permanent access point at 15.04 (as referenced on works layout plan 15). It enables construction vehicles and materials to safely and efficiently access the site without causing undue disruption to traffic on the Golf Links Road. This temporary arrangement is critical to minimising traffic hazards and avoiding significant road closures in the area (Refer to Section 5.6.6, "Skerries South Substation,").

2. Duration of Works in This Location

The construction works at the South Skerries Substation, including the creation of the permanent access, are anticipated to last approximately 3–6 months, depending on local site constraints, weather conditions, and the availability of resources (Refer to Section 5.6.6, "Skerries South Substation," of the EIAR). The temporary right of way will only be required during this construction period, after which it will no longer be utilised. Every effort will be made to complete the works efficiently and within the Projected timeline.

3. Minimising Impacts on Landowners

During the construction period, the Applicant will strive to maintain reasonable access for the landowner to their field behind the dwelling. Any necessary temporary adjustments to access will be communicated clearly and planned to minimise disruption. Stakeholder engagement remains a priority to ensure the landowner's concerns are addressed, including providing advanced notice of key construction activities (Refer to Section 5.3.13 of the EIAR, "Construction Traffic Management Plan,").

4. Justification for Temporary Right of Way Despite Adjoining Golf Links Road

While the permanent access point directly adjoins the Golf Links Road, constructing this access without temporary reliance on the laneway would require extensive road closures and significant traffic management measures. These disruptions would disproportionately affect local traffic, including residents and St. Michael's School traffic. The temporary right of way ensures a safer and more efficient construction process, balancing the operational requirements of the Project with the needs of the local community.

6. Summary of Issue Raised

The submission notes objection to the proposals on the basis that *"the acquisition of the land will further prevent the referenced landowners from developing the lands themselves. In this regard, there is a derelict lodge located on the lands that are to be acquired as part of Railway Order Application which was formerly in residential use. The compulsory purchase of the lodge and the demolition of the lodge and its replacement with a sub-station will prevent the current owners from refurbishing the lodge and bringing it back into use. Further while the lands are zoned GB various uses are nonetheless 'Permissible in Principle' as set out in the zoning matrix for GB lands in the Development Plan."*

Response to Issue Raised

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

5.3.7 SB0122 – O'Dwyers GAA Club

Representative: KT Designs - Architectural & Planning Consultants

Submission Location – Balbriggan.

1. Summary of Issue Raised - The submission notes that O'Dwyers GAA Club welcomes the proposal for the DART+ Coastal North Project, in principle, as it will bring far more frequent trains to and from the Balbriggan area.

Response to Issue Raised

The Applicant welcomes the support for the DART+ Coastal North Project from O'Dwyers GAA Club, Balbriggan.

2. Summary of Issue Raised - The submission includes a request to move the access road to the Balbriggan Substation, located to the north of Bremore Park, to facilitate potential future expansion of O'Dwyers GAA Club, citing population growth in the Balbriggan area and expectations that Club membership will continue to grow at a rate of 10-15% per annum going forwards.

Response to Issue Raised

The Applicant acknowledges the concerns raised in the submission. However, the location and alignment of the Balbriggan Substation and access road respectively have been located in what is considered by the Applicant to be the optimal location based on the Multicriteria Assessment and design development completed as part of the Option Selection Process.

The option selection process itself is set out in Chapter 3 Alternatives of the EIAR as well as Chapter 5 of Appendix A3.3 Preliminary Options Selection Report, included as part of the Railway Order application documentation.

A clearly defined appraisal methodology was used in the selection of the Preferred Option for the Project, in relation to project elements such as substations, turnback facilities, structural interventions etc. Consistent with other exchequer-funded projects, the appraisal methodology is based on 'Guidelines on a Common Appraisal Framework for Transport Projects and Programmes' (CAF) published by the Department of Transport, Tourism, and Sport (DTTAS), March 2016 (updated 2020) and NTA/Iarnród Éireann's Project Approval Guidelines. The process comprises a two-stage approach:

- Stage 1 – Preliminary Assessment (Sifting); and
- Stage 2 – Multi-Criteria Analysis (MCA)

1. Selection of the Balbriggan Substation location

The required number and the location of substations forming part of DART+ Coastal North has been determined from a traction power simulation study which established that eight new

substations will be required between Malahide and Drogheda to supply power to the railway network.

The siting of each substation within any general area considered the following:

The land-use and development context of potential locations;

- The substations will be required to be located adjacent to the railway line in the form of a fenced compound surrounding a single storey building which will house all the necessary electrical switching and feeding equipment;
- The substations will be connected to the local power distribution network and the OHLE system using insulated cables. These cables will be installed in buried routes for additional protection;
- The substations will need to be accessible from the local road network for construction and maintenance purposes;
- The footprint of each substation compound is estimated to be up to approximately 1,900 sqm and will include the building required to house the electrical equipment for both IE and ESB.

The location of each of the 8 substations is highly sensitive to the requirements of the DC system utilised by DART services and each substation is required to be located as close as possible to an optimum location identified in the power study completed as part of the design development.

Section 5.6.5 in the Option Selection Report, Technical Report published as part of Public Consultation No.2, outlines the results of the preliminary and Multi Criteria Assessment processes in relation to the proposed Balbriggan Substation.

Three options, excluding the 'Do-Nothing' option, were identified for the location of the Balbriggan Substation. Further to completion of the Multi-Criteria Assessment, Option 3 was identified as the preferred option. This is based on the comparative assessment of the three options against set criteria. Options 1 and 2 were deemed comparatively to be less favourable as they were located within the proposed Bremore Park, with associated disadvantages for public safety resulting from vehicle interaction (during both construction and operation phases) with the public visiting the park. Option 3 was identified as the preferred option for the Balbriggan Substation as it was comparatively more favourable than other options over predominately all assessment criteria.

The details of the initial sifting assessment carried out, as part of the selection of the location for the Balbriggan Substation, are included in Chapter 7, Section F of Annex 3.2.

2. Selection of the Balbriggan Substation access location and alignment

The location and alignment of the proposed access road to the substation has been identified to provide a link to the local road network, in a way that best fits with its surrounding area and engineering constraints, while minimising the impact to the impacted landowner by following an outer boundary. Moving the access road by 200m to the north as proposed in the

submission would introduce a more impactful and costly design over that which has been included in the Railway Order application. Should O'Dwyers GAA Club seek to expand in future, the Applicant is open to discussing solutions that work for both parties, including potential access road crossing points, as may be appropriate at that time.

3. Summary of Issue Raised - The submission notes that should the proposal for the access road and compound border O'Dwyer land / future lands the club would need to have a level of agreement for access to retrieve sports equipment i.e. footballs & sliotars that may inadvertently be knocked into the proposed access road and/or compound.

Response to Issue Raised

In the event that An Bord Pleanála is to grant approval to the Railway Order Application, and the Project progresses, the Applicant is open to discussing arrangements for access to retrieve sports equipment, noting that some restrictions may apply given the nature of the access road and its intended purpose.

5.3.8 SB0157 – Mary MacLoughlin

Representative: Sheehan Planning

Submission Location – Hackettstown, Skerries.

1 Summary of Issue Raised

The submission raises concerns about the disproportionate impact of compulsory purchase on private property rights, particularly regarding the acquisition of lands directly adjoining residential properties, at Skerries South. The relevant lands referenced in the CPO/Railway Order documentation are shown on plan no. Server Map Plan no. DCN-SM-005555-5022) as proposed to be:

1. permanently acquired (Ref. DCN.5022.P.4(A));
2. temporarily acquired (Ref. DCN.5022. T.4(A);
3. and where a temporary right of way is to be acquired (Ref. DCN.5022.4T.4(A).

The submission contests that the amount of land proposed for acquisition exceeds what was explained to the landowners by agents and/or servants of CIE prior to the submission of the application for the Railway Order, making it disproportionate to the Project's requirements. Furthermore, the submission notes that the landowners are of the opinion that the extent of land take subject to compulsory purchase/acquisition is excessive.

Response to Issue Raised

With regards to prior consultation with the submitter, the Applicant has worked hard to communicate widely and clearly with the public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route. The Project design evolved throughout the early design stage. This meant that additional potentially impacted landowners / occupiers were identified as the Project design progressed. The Applicant attempted to identify and notify potentially impacted landowners / occupiers as soon as the need for land acquisition at their property was identified. In relation to this submission, the lands were identified as lying within the Project boundary at PC2 as part of the Preferred Option. Property owners' names have been identified via Property Registration Authority of Ireland (PRAI) searches.

The Project team has engaged directly with these property owners since it became apparent that lands registered to them would be impacted by the Project boundary. Initially, as part of a wider mail-out to all properties in the Project area, a leaflet was distributed to this property at the start of PC1 in Q3 2022. A letter and leaflet were sent to the landowners following identification of substation locations as part of PC2 documentation in Q2 2023, notifying them that their property was within the extents of the Project boundary. Prior to this notification there had been consultation with the landowners in relation to permission to carry out environmental surveys on their lands.

A summary of key communications is presented below to demonstrate the efforts to engage with the landowner:

- 2023.05.25: Initial landowner consultation meeting to discuss PC2 proposals. The meeting led to some design revisions.
- 2023.09.15: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some further design revisions.
- 2023.10.02: Follow up meeting to discuss revised layout to Skerries South Substation. The meeting led to some final design revisions.
- 2023.10.20: Email containing revised layout sent to all members of the Dowling Family relevant to the registered lands.
- 2023.20.26: Email from Carmel Dowling to DART+ Coastal North noting agreement with the design proposed in email sent on 2023.10.20.

Further to the above, some additional email correspondences and several design iterations, such as those described in the Chapter 3 Alternatives of the EIAR, have helped move the consultation along to a point where approval in principle was agreed with the landowners. Some email and telephone correspondences in relation to survey access requests has also taken place during the design development.

The Applicant does note that the registered owners from available PRAI data were listed as Kevin Dowling and Carmel Dowling and the key communications as outlined above were with same. Following the Railway Order application submission, the Applicant was informed by Mary MacLoughlin and Teresa Dowling that they were also joint owners. Consequently, a notification letter with the relevant accompanying RO documentation extracts were issued to both of these individuals as well.

Based on the series of consultations with the property owners as described above the following concerns were addressed through design developments:

- Removal of shared access of the existing farm access as this was not acceptable to the landowners;
- Positioning the substation as far as reasonably practicable in the northwest corner as this was preferable to the landowners;
- At the request of the landowners, including resultant sterilised land in the northwest corner in the CPO.

As outlined on the Works Layout Plan No.15, a new junction is proposed from Golf Links Road (15.04). The temporary access (15.05) is required to construct this permanent access. The temporary access will cease to be used once the construction of the permanent access is complete. The permanent access will be used to construct the Skerries South Substation.

Initially, a single permanent access with shared rights of way was proposed. However, following consultation with the property owners, it was made clear that a shared access proposal was not acceptable to them, so separate access arrangements needed to be identified. The option of constructing the proposed permanent access without the need for a supplementary temporary access was also considered. However, this option was ruled out based on the significant impacts that the required construction traffic management (including road closures) would have had on the wider area and school traffic.

The temporary construction compound (15.03) is defined in the southwest corner by the proposed permanent compound (15.02) fence line and associated earthworks, which are to be maintained by the Applicant, as presented in the South Skerries Substation Site Plan (D+WP56-ARP-P4-NL-DR-RO-000810).

In the northeast, due to the level difference between the site and the road, a new embankment is required to facilitate the new access road. It is proposed to provide a mix of vegetation along the northeast embankment as screening to the adjacent property. In the northwest of the site the substation has been placed as far north as possible to address the property owner's feedback as described above, while ensuring the existing heritage structure is protected and maintained.

The remaining triangle of land in the northeast corner (approx. 600m²) was requested by the Applicant to be included in the CPO as the size and shape of the remaining land was no longer suitable for agricultural use.

The Applicant has therefore ensured that the extents of land included in the CPO are the minimum necessary to accommodate the works required for the DART+ Coastal North Project and mitigate impacts on the landowner.

2. Summary of Issue Raised

The submission questions the compatibility of the proposed substation and associated developments with the "Green Belt" (GB) zoning objectives of the Fingal County Development

Plan, arguing that they contravene planning guidelines. The submission questions whether the proposed substation at Skerries South, and associated access point, fits with current land zoning objectives.

The submission suggests that the chosen site for the substation is not optimal, given the availability of alternative zoned lands where "Utility Installations" are permissible in principle, such as those particular lands located to the immediate north of the Skerries South substation, across Golf Links Road, zoned upon which 'Utility Installations are 'Permitted in Principle'.

The submission states that *"it is unclear if the development of a substation on 'RA' zoned lands to the immediate north of the impacted lands, upon which the development of 'Utility Installations' is 'Permitted in Principle', was considered as an alternative to the compulsory purchase of the affected landowners lands."*

The submission notes that *"The lands which are to be permanently acquired are zoned as GB (green belt) in the Fingal County Development Plan 2023-2029 the object of which is to "Protect and provide for a Greenbelt". The development of a large concrete/cement rendered metal roofed sub-station surrounded by fencing does not protect and provide for a greenbelt."*

The submission questions how the Proposed Development fits with the current land zoning objectives of the area and notes *"the vision for greenbelt lands as set out in the Fingal County Development Plan to "Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas."*

The submission notes that *"It is also unclear how the development of a large utility installation building on green belt lands, immediately next to lands zoned for residential development, is consistent with the requirement in the zoning vision to 'check unrestricted sprawl of urban areas' and 'to prevent countryside encroachment'."*

Response to Issue Raised

A development materially contravenes a development plan if it fundamentally conflicts with the core objectives, policies, or zoning vision. However, plans also include flexibility to allow for projects of strategic importance or developments that meet overriding public need.

The proposed substation at Skerries South is an essential component of the DART+ Coastal North Project, a nationally significant infrastructure initiative aimed at delivering sustainable

public transport and supporting Ireland's climate action goals. While the submission raises concerns about compatibility with the Green Belt (GB) zoning objectives, it is important to recognise that the development does not fundamentally contravene the core objectives of the Fingal County Development Plan. Instead, it represents a carefully considered balance between strategic public need and the protection of sensitive landscapes.

The GB zoning aims to prevent urban sprawl, maintain rural-urban boundaries, and preserve attractive landscapes while supporting multifunctional benefits for both urban and rural communities. The substation does not contribute to urban encroachment or unrestricted sprawl, as it is essential public infrastructure, not a residential or commercial development. Additionally, its limited footprint, combined with landscape screening and design mitigation, ensures that its impact is minimised. Its role in enabling low-carbon public transport aligns with broader climate action goals, delivering long-term benefits to both urban and rural areas.

The submission references RA-zoned lands to the north, where "Utility Installations" are permitted in principle, as a potential alternative. However, a comprehensive optioneering process was undertaken, assessing technical, environmental, and operational considerations. While RA-zoned sites were explored, they presented significant constraints, including residential proximity and grid connectivity challenges. The chosen site at Skerries South was determined to be the most operationally viable location, with fewer overall impacts and a clearer path to delivery.

It is acknowledged that Green Belt policies are designed to protect and enhance open landscapes, and developments of this nature must demonstrate their necessity. In this case, the strategic importance of the DART+ Coastal North Project provides a compelling justification. This infrastructure represents significant public benefit, supporting national climate goals, sustainable mobility, and economic development. Such developments, while not explicitly listed in GB zoning provisions, can be accommodated where the overriding public need is demonstrated, provided the impact is mitigated.

3. Summary of Issue Raised

Traffic safety. The submission notes that the landowners are highly concerned that the acquisition of the lands and the associated works and development will adversely affect traffic safety in the area.

The submission notes that the landowners consider that the Railway Order, if confirmed by the Board, would disproportionately impact on their property rights, will diminish the value of their property and is contrary to proper planning and sustainable development where it will give rise to traffic hazards and arguably contravenes the site's zoning objective.

Response to Issue Raised

1. Traffic Safety Concerns

The construction works for the South Skerries Substation and associated developments have been designed to minimise disruption to local traffic and ensure safety. As part of the design

process a road safety audit stage 1 was carried out which ensured the forward visibility, geometry, gradients and associated sight lines are compliant with the requirements for the traffic speed. To that end, the Applicant has followed best practice guidance and standards throughout. The Applicant also notes that the substation will largely be unmanned during the operational phase, with predicted traffic use being limited to 1 vehicle approximately every 2 weeks to carry out an inspection.

The Construction Traffic Management Plan (CTMP) includes site-specific measures to manage traffic volumes, reduce potential hazards, and coordinate safely with local road users, cyclists, and pedestrians. These measures will ensure safe ingress and egress from the substation site (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation,"). Controlled vehicle access, clear signage, and the scheduling of deliveries during off-peak hours are key strategies to mitigate traffic impacts.

2. Impact on Property Rights and Value

The South Skerries Substation location was selected following a comprehensive Multi-Criteria Analysis (MCA), which considered environmental, social, and economic factors. The Railway Order process incorporates stakeholder engagement to address potential impacts on property rights and value (Refer to Section 5.6.6, "Skerries South Substation," and Section 5.3.3, "Construction Compounds,"). The Applicant notes that subject to the confirmation of the Railway Order by An Bord Pleanála, compensation will be addressed in accordance with statute and Compulsory Purchase practice and procedure as and when statutory notices are served.

3. Alignment with Zoning Objectives

A response in respect of the site's zoning objective is given under Point 2 above. The Project complies with sustainable development principles and the site's zoning objectives, ensuring the substation's construction contributes to improved infrastructure while reducing environmental impacts (Refer to Section 5.1.2, "Sustainable Construction Principles," and Section 5.6.6, "Skerries South Substation,").

4. Traffic Hazard Mitigation

Risks related to traffic have been proactively addressed through site-specific strategies. The South Skerries Substation construction incorporates measures to safeguard local traffic conditions, including managing heavy goods vehicle (HGV) movements and temporary access routes (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," of the EIAR). The Railway Order application ensures these mitigations are embedded into the overall project plan to avoid creating traffic hazards during and after construction.

4. Summary of Issue Raised

The submission raises concerns over the suitability of the proposed access to serve the proposed Skerries South Substation, noting that *"if a temporary access point and temporary*

right of way is needed to avoid traffic hazards/disruption it would seem to follow that a permanent access point from the Golf Links Road would give rise to a traffic hazard. The site is therefore not suitable for the need envisaged”

The submission also refers to potential traffic hazards from the proposed access points and rights of way, citing restricted sightlines and the proximity of St. Michael’s School as contributing factors. Concerns are directed at both the permanent and temporary accesses proposed where the submission suggests sight lines are not acceptable.

Response to Issue Raised

The access design for the South Skerries Substation has been rigorously assessed and optimised to ensure safety, operational efficiency, and minimal community disruption. The temporary use of access 15.05 (as referenced on works layout plan 15) is a necessary and temporary measure to enable the safe construction of the permanent access at 15.04 while minimising impacts on the local area, including school traffic. These measures reflect the Project’s commitment to addressing stakeholder concerns and adhering to best practices in traffic and safety management.

1. Design and Safety of Access Points

The design of the temporary and permanent access points for the South Skerries Substation has undergone a comprehensive assessment, including a Stage 1 Road Safety Audit, to ensure compliance with safety standards. This process evaluated critical factors such as forward visibility, traffic speeds, geometry, gradients, and sightlines to minimise potential hazards (Refer to Section 5.6.6, "Skerries South Substation," in the EIAR). The permanent access point at 15.04 is designed for very limited use, with traffic predicted to be approximately one vehicle every two weeks for routine inspections, ensuring minimal long-term impact on traffic safety and local roads.

2. Temporary and Permanent Access Points

A temporary access point at 15.05 is required to facilitate the safe and efficient construction of the permanent access at 15.04. The use of 15.05 will cease once the construction of the permanent access is complete (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," in the EIAR).

A permanent access point at 15.05 was initially proposed but ruled out following consultation with the property owner, who was unwilling to share rights of way. Constructing the permanent access at 15.04 without temporary reliance on 15.05 was also evaluated but was deemed not feasible due to potential for significant impacts on local traffic, including potential road closures and disruptions near St. Michael’s School (Refer to Section 5.6.6, "Skerries South Substation," of the EIAR).

3. Proximity to St. Michael’s School and Traffic Safety

The design has accounted for the proximity of St. Michael’s School and implemented measures to mitigate potential risks. This includes restricting construction vehicle movements

during school hours and providing clear signage to ensure safety for pedestrians and other road users (Refer to Section 5.3.13, "Construction Traffic Management Plan," and Section 5.6.6, "Skerries South Substation," of the EIAR). The use of temporary access at 15.05 minimises traffic congestion and disruption near the school during construction, safeguarding the interests of the local community.

4. Traffic Hazard Mitigation

The chosen access arrangement, including temporary reliance on 15.05, reflects a carefully considered balance between operational feasibility, traffic safety, and community impact. The Construction Traffic Management Plan (CTMP) ensures safe traffic flow and minimal disruption during construction, while long-term use of the permanent access ensures negligible traffic risks following completion of works (Refer to Section 5.3.13, "Construction Traffic Management Plan," of the EIAR).

5. Summary of Issue Raised

The submission questions the need for the temporary right of way included in the Railway Order application documents, over the laneway located to the east of the proposed permanent access location. The views of the landowner are that the temporary right of way will serve to impede, for an unknown period of time, access from the dwelling to the field behind the dwelling. It is also unclear why the temporary right of way is needed where the lands to be permanently acquired directly adjoin the Golf Links Road, from which road permanent access to the proposed substation is proposed.

Response to Issue Raised

The temporary right of way is a necessary and strictly time-limited measure to facilitate the construction of the permanent access at South Skerries Substation. The anticipated duration of works in this location is 3–6 months, after which the temporary right of way will no longer be used. The Applicant remains committed to minimising disruption for the landowner and the local community and ensuring timely completion of the works.

1. Purpose and Necessity of the Temporary Right of Way

The temporary right of way over the laneway to the east of the proposed permanent access is essential to facilitate the construction of the permanent access point at 15.04 (as referenced on works layout plan 15). It enables construction vehicles and materials to safely and efficiently access the site without causing undue disruption to traffic on the Golf Links Road. This temporary arrangement is critical to minimising traffic hazards and avoiding significant road closures in the area (Refer to Section 5.6.6, "Skerries South Substation,").

2. Duration of Works in This Location

The construction works at the South Skerries Substation, including the creation of the permanent access, are anticipated to last approximately 3–6 months, depending on local site constraints, weather conditions, and the availability of resources (Refer to Section 5.6.6, "Skerries South Substation," of the EIAR). The temporary right of way will only be required

during this construction period, after which it will no longer be utilised. Every effort will be made to complete the works efficiently and within the Projected timeline.

3. Minimising Impacts on Landowners

During the construction period, the Applicant will strive to maintain reasonable access for the landowner to their field behind the dwelling. Any necessary temporary adjustments to access will be communicated clearly and planned to minimise disruption. Stakeholder engagement remains a priority to ensure the landowner's concerns are addressed, including providing advanced notice of key construction activities (Refer to Section 5.3.13 of the EIAR, "Construction Traffic Management Plan,").

4. Justification for Temporary Right of Way Despite Adjoining Golf Links Road

While the permanent access point directly adjoins the Golf Links Road, constructing this access without temporary reliance on the laneway would require extensive road closures and significant traffic management measures. These disruptions would disproportionately affect local traffic, including residents and St. Michael's School traffic. The temporary right of way ensures a safer and more efficient construction process, balancing the operational requirements of the Project with the needs of the local community.

6. Summary of Issue Raised

The submission notes objection to the proposals on the basis that *"the acquisition of the land will further prevent the referenced landowners from developing the lands themselves. In this regard, there is a derelict lodge located on the lands that are to be acquired as part of Railway Order Application which was formerly in residential use. The compulsory purchase of the lodge and the demolition of the lodge and its replacement with a sub-station will prevent the current owners from refurbishing the lodge and bringing it back into use. Further while the lands are zoned GB various uses are nonetheless 'Permissible in Principle' as set out in the zoning matrix for GB lands in the Development Plan."*

Response to Issue Raised

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

5.3.9 SB0160 - The Land Development Agency (Housing and Sustainable Communities Agency)

Representative: Aoife O'Connor-Massingham

Submission Location – Hackettstown

Summary of Issue Raised

The LDA notes its support for the DART+ Coastal North Project in principle. However, it requests an Oral Hearing to address the issues raised in its submission or the inclusion of conditions in the Railway Order to mandate the relocation and resizing of easements and compounds.

The observer states in the submission that *“In the event an Oral Hearing is not held, and the Railway Order is granted, The LDA respectfully request that the following condition is included:*

Prior to the commencement of development, the developer shall, in consultation with the relevant landowners:

A) relocate, and/or resize, the proposed temporary compound, Works No. 15.13, so as not to impact the delivery of permitted residential development at this location;

B) agree a timeframe for the utilisation of lands at Hackettstown for a temporary compound and easement (DCN.5022.T1.(A) and DCN.5022.4T1.(A))

C) amend the location of the permanent easement, DCN.5022.4P.1(A), so as not to interfere with permitted residential development at this location. This easement should be proposed at a location that remains publicly accessible and does not prevent the delivery of residential units.”

The submission notes that the proposed diversion works were not included in the information published as part of the non-statutory public consultation events. However, reference is made in the submission to past discussions regarding the proposals with the DARTT+ Coastal North project team.

Response to Issue Raised

The Applicant welcomes the support from the LDA.

The temporary compound CC-23772 (W) referenced 15.13 on the Works Layout Plan 15 is required to divert the existing MV overhead power line under the railway at this location. The size and location of the compound has been carefully considered by the Applicant and is critical to facilitate the electrification of the railway. It is noted that the Proposed Development would also require the underground diversion of the existing MV overhead power line as it traverses their site. Extract of Works Layout Plan 15 is shown below.

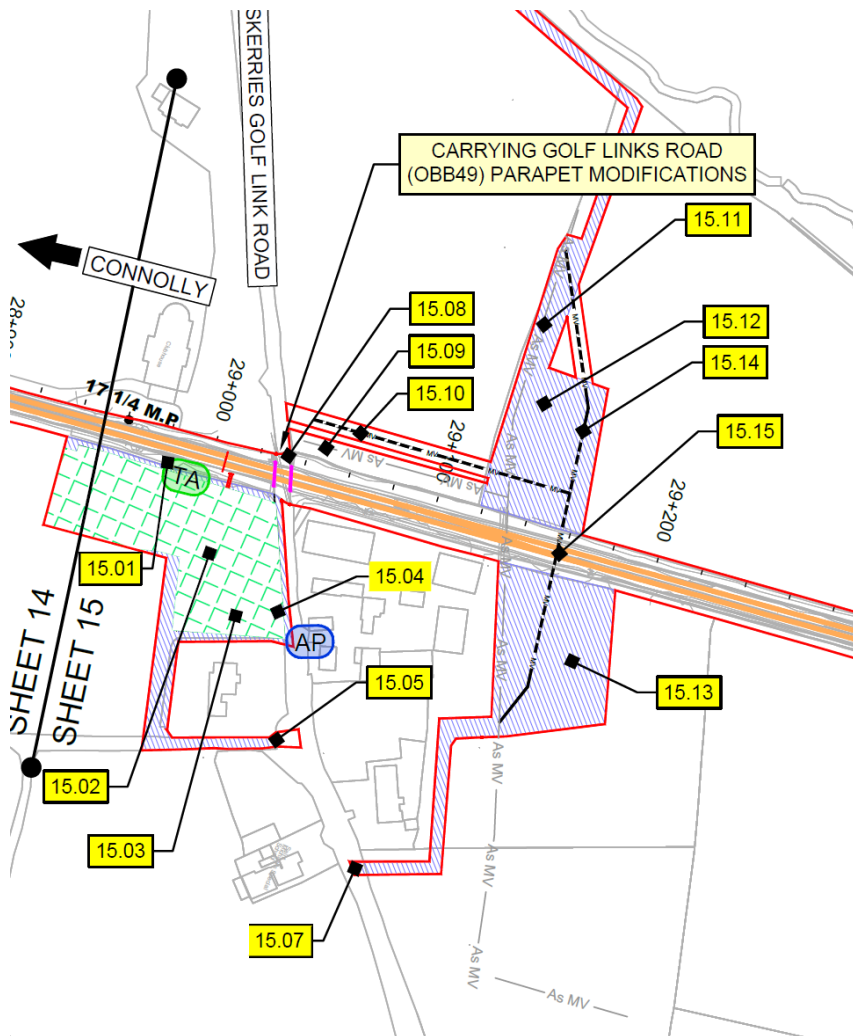


Figure 21 - Extract of Works Layout Plan 15

The Applicant notes that the holding or otherwise of an oral hearing is a decision for An Bord Pleanála.

In respect of the timeline for the utilisation of lands, the Applicant has set out a timeline in the EIAR for the proposed construction of the DART+ Coastal North Project. This timeline is however subject to the approval of the Railway Order, as well as other government approvals. The Applicant remains committed to continued engagement with the landowner and as soon as the Applicant is in a position to do so, will agree a timeline for the use of the lands at Hacketstown for a temporary compound and easement (DCN.5022.T1.(A) and DCN.5022.4T1.(A)).

The permanent easement DCN.5022.4P.1(A) is required to ensure that the ESB will have the rights to maintain the asset as proposed which is needed to safeguard the necessary underground diversion at this location. Extract of Property Plan 22 is shown below.

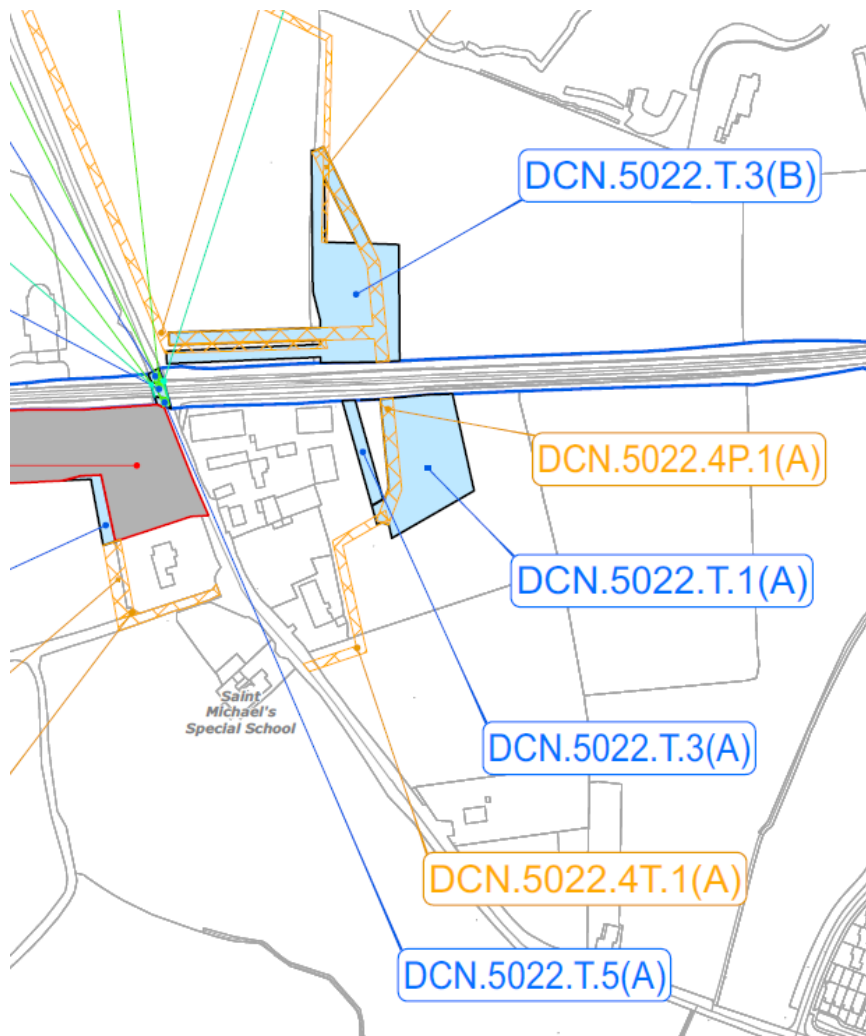


Figure 22 - Extract of Works Layout Plan 22

Consultation

IE is committed to working collaboratively with the LDA to address these requirements in a manner that facilitates both the DART+ Project and the development plans. Consultation with the Land Development Agency (LDA) has taken place during the development of the DART+ Coastal North design. An initial meeting was held on 2023.06.13 where developments at Castlelands, Balbriggan and Hackettstown were discussed and potential constraints identified. Further to this meeting the LDA shared some layout plans identifying future ESB diversions relevant to the Hackettstown site which were considered by the DART+ Coastal North design team.

Following submission of the RO Application further engagement between the LDA and the DART+ Coastal North team took place in October of 2024 where the proposals were discussed. It was agreed in principle at that meeting that both parties would continue to engage to co-ordinate works, to ensure that both the ESB diversions and the UTX can be accommodated with the minimum impact on this land bank. The LDA has been advised that

the Applicant has included temporary acquisition of lands within the Railway Order application, to allow for the necessary UTX works.

The Applicant acknowledges the importance of aligning the MV line diversions with the approved development plans and will continue to work closely with the Land Development Agency to deliver the DART+ Project while supporting the successful implementation of the site's road and infrastructure layout.

5.4 1.3 Zone D

There were no submissions received from landowners in Zone D.

5.5 Zone E

5.5.1 SB0038 – Conor Rock

Representative: John Spain Associates.

Submission Location – Drogheda

1. Summary of Issue Raised

The submission notes concern with Noise, Vibration & Air Quality during construction as a major concern to the landowner.

Impact on Residential Amenity: Mr. Rock supports the development but is concerned about the impact on his residential amenity during the construction period, which is expected to last at least three years. The issues include noise, vibration, dust, and air quality, as well as the disruption caused by construction traffic and the demolition of the existing Railway Terrace bridge (OBB080).

Response to Issue Raised

The Applicant appreciates the support of the DART+ Coastal North Project offered by Mr. Rock whilst acknowledging the concerns raised in the submission.

The Applicant notes that the main works in the vicinity of this residence include the construction of the proposed Drogheda Substation and the reconstruction of OBB80/80A/80B Railway Terrace Bridge. There are also some minor works to the depot at Drogheda. These works are described in detail in the Railway Order application, in Chapter 4 Description of the Proposed Development and Chapter 5 Construction Strategy of the EIAR as well as in the accompanying drawings.

In particular, in respect of Mr. Rocks concerns about the impact on his residential amenity during construction, the Applicant notes that a comprehensive assessment of the potential effects of the Proposed Development has been undertaken and is presented in the EIAR which accompanied the Railway Order application. This assessment was carried out in accordance

with the relevant EU and national legislation and best practice guidance. A suite of mitigation measures has been identified to ensure that environmental impacts are minimised through the construction period. These are all documented in the individual chapters of the EIAR and in Chapter 27 Summary of Mitigation and Monitoring Measures.

A detailed Construction Environmental Management Plan (CEMP) has also been prepared and is included in Appendix A5-1 of the EIAR. This details how the construction of the Project will be managed throughout construction to minimise environmental impacts. This Plan will be further developed by the Contractor prior to construction in consultation with the relevant authorities.

1. Air Quality

Chapter 12 of the EIAR has assessed the likely significant effects of the DART+ Coastal North Project on Air Quality.

With respect to the construction phase, the air quality impact of the redistribution of local road traffic during road closures and from construction traffic has been assessed both locally and regionally. The assessment concluded that, given the temporary nature of the construction phase, the overall impact of NO₂, PM₁₀ and PM_{2.5} concentrations as a result of the Proposed Development is short-term and neutral.

In addition, the assessment considered the impact of construction dust. With respect to dust nuisance, a sensitivity assessment was completed in Section 12.4 of the EIAR and an assessment of the potential dust generation due to construction has been completed in Section 12.5 of the EIAR. Section 12.6 of Chapter 12 of the EIAR details the mitigation measures for the construction phase of the Project. The contractor will develop and implement an Air Quality Management Plan and this will be agreed with the respective local authorities prior to construction commencing. The Air Quality Management Plan will include appropriate dust mitigation measures and dust deposition monitoring.

At Drogheda specifically, the assessment concluded that when the dust minimisation measures detailed in the mitigation section of the Air Quality chapter are implemented, fugitive emissions of dust from the site are not predicted to be significant and pose no risk of dust nuisance or risk to human health or to ecological receptors. Thus, there will be no significant residual construction phase dust impacts.

2. Noise & Vibration

Chapter 14 of the EIAR assesses the likely significant noise and vibration effects of the proposed DART+ Coastal North Project.

The construction of the Drogheda Substation will be carried out over a relatively short timeframe, primarily during normal working hours.

The re-construction of OBB80/80A/80B will take place over an approximately 18-month period. Due to the importance of the Northern Line to commuters, it is intended that it will

remain operational throughout the construction phase. Where possible, works will be undertaken in safe zones, during daytime periods. In certain circumstances full possession of the railway (i.e. no trains running) will be required and these will typically take place during weekend and night-time possessions. Given the location of the bridge, much of the work will need to be done during track possessions. It is expected that these will be a combination of weekend and night-time possessions.

The EIAR (Chapter 14 Noise & Vibration) identifies a suite of mitigation measures to mitigate the impact from noise and vibration during the construction phase. Appendix A5.1 in Volume 4 of the EIAR sets out the Construction Environmental Management Plan (CEMP) for the Proposed Development. It includes the approach to manage, mitigate and monitor noise and vibration during the Construction Phase.

The extent and nature of the construction noise impacts is dependent on activity (for example site clearance, ground investigation) and proximity to noise sensitive locations. The predicted noise impact from the construction activities was assessed against the thresholds of significance for construction noise. A list of activity-specific measures to mitigate the construction noise impacts if the threshold values are exceeded are outlined in Section 14.6.1 of Chapter 14 of the EIAR. By applying these mitigation measures the impacts of construction noise will be appropriately managed. There will also be ongoing community liaison channels (see below) in place during construction to respond to any specific concerns that arise.

When night-time works are required, they will be undertaken in accordance with the mitigation measures included in the EIAR, which aim to reduce impacts as much as possible. A Noise Management Plan will be part of the construction stage of the Project. The Applicant will ensure residents living near the rail line are informed of upcoming works and given advance notice of any disruptive works.

Even with the implementation of mitigation measures, the EIAR, Chapter 14 Noise & Vibration identifies that, where works occur in proximity to sensitive receptors, the resultant residual effects during the construction phase will likely be negative, moderate to very significant and temporary to short-term.

It goes on to state that, given the proximity of construction activity to some noise sensitive locations, the mitigation measures proposed may not be sufficient to fully mitigate the noise impact and that temporary accommodation will be offered to eligible owners/occupiers where the criteria in Table 14-4 as presented in Section 14.3.6.2 (within the EIAR) are met.

3. Residential Amenity

Impacts on residential amenity are addressed in Chapter 7 Population of the EIAR. This identifies that at least very significant noise effects prior to mitigation are predicted for the closest residential receptors (including those properties on McGraths Lane) affecting residential amenity. The assessment concludes that even with the implementation of mitigation measures, significant residual effects are identified for the construction works, due

to the bridge works in Drogheda (OBB80/80A/80B). These works will be temporary albeit it is acknowledged that the works will be over an extended period.

Furthermore, Chapter 23 Human Health of the EIAR assesses impacts to health as a result of changes to air quality during construction of the Project, and no significant effects are predicted. For further details, please refer to Section 23.8.1 of Chapter 23 of the EIAR.

4. Community Engagement

It is important to note that, as part of the construction strategy, a Community Liaison Officer (CLO) will be appointed for the duration of the Project. The CLO will be in place to communicate with the residents and to address any concerns raised by residents during the construction phase.

The CLO will carry out communications activities, such as:

- to provide information to local residents about progress of the Project
- to share noise and vibration monitoring results and explain noise mitigation measures being put in place,
- to inform the local community about works likely to cause significant noise or vibration and/or works planned to take place outside of core working hours,
- to inform of mitigations regarding the above issues.

In summary therefore, the Applicant acknowledges that during the construction phase of the Proposed Development, there will be impacts on the residential amenity of this property. This is fully acknowledged in the EIAR. The Applicant is committed to the implementation of all of the measures detailed within the EIAR (and the CEMP) in order to minimise environmental effects during the construction phase. These measures, which are included in the plans and particulars submitted with the Railway Order application will be incorporated into the Railway Order, if granted.

2. Summary of Issue Raised

The submission raises concern with access to his property during the construction works as the proposed works will significantly alter the road layout and access to Mr. Rock's property. The demolition of the Railway Terrace bridge and the realignment of McGrath's Lane will terminate his current access to Drogheda Town Centre and the railway station, replacing it with a longer and more congested route. In the figure below, the blue line indicates the proposed route which our client would be required to use via Marsh Road the R150 and extends to c. 2km. The green line represents the new route our client will be faced with to access Drogheda railway station and extends to c. 2.6km, including a challenging gradient along the new access road to the R150. These are routed along the field adjacent to our client's property and links to the new access road serving the completed (but unoccupied) residential development at Newtown View to the R150 Marsh Road to connect to Drogheda town centre. The R150 Marsh Road is typically a highly congested route which will significantly add to our client's travel time to the town centre and the railway station and will require reliance on private car due to the length of the route. This is a substantial encroachment on our client's

amenity and convenience to public transport and will result in prolonged travel times and a requirement for unsustainable travel by private car.

This results in several sustained negative impacts to our client's daily life for a period of at least 3 years and significantly constrains access to family, neighbours and everyday facilities and amenities on Dublin Road including shops, medical facilities, church, public transport etc. and limit potential for social engagement.

it is respectfully requested that our client be permitted to access Dublin Road via the existing Irish Rail maintenance depot entrance from McGrath's Lane and route through the railway station for the duration of the construction phase.

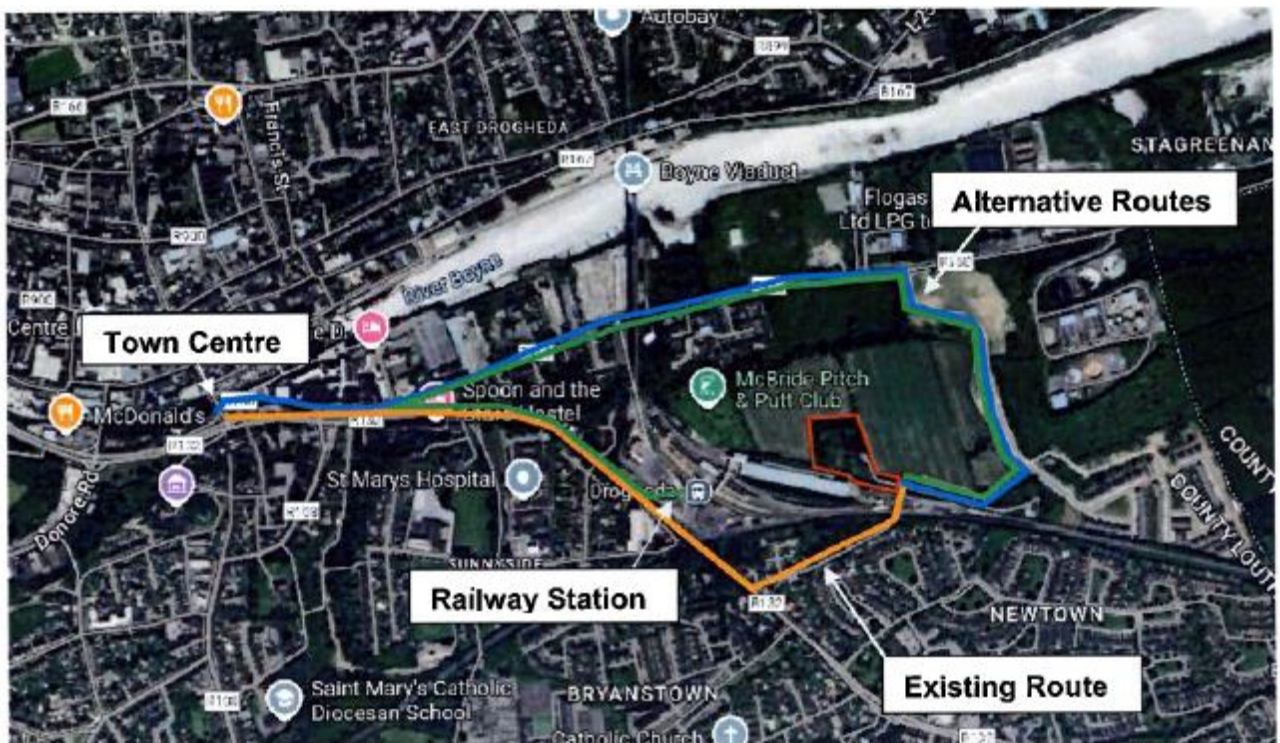


Figure 23 – Diversion Routes during Construction

Response to Issue Raised

The Applicant acknowledges that for the duration of the construction phase of the Project in this location, there will be an impact both on journey distance and journey times for the residents of Chanticleer (and the adjacent property).

The current travel distance to the station is 900m (approximately 13 minutes' walk or 3 minutes' drive). The proposed route will more than double the travel distance and associated travel time to the station to 2.2km, via the new access road to the R150 and the narrow rail under pass along the R150, with an increased journey duration of approximately 28 minutes' walk or 7 minutes' drive. It is acknowledged that journey times (driving) are dependent on the time of day and associated levels of traffic.

The current travel distance to the town centre is 1.6km (approximately 22 minutes' walk or 5 minutes' drive). The proposed route will increase the travel distance and travel time to the town centre by approximately 30% to 2.2km, via the new access road to the R150, which is approximately 28 minutes' walk or 7 minutes' drive.

This impact on journey characteristics is assessed in the EIAR (Chapter 7 Population) and the assessment states that *"the Marsh Road link will also need to be used by the residential properties on the north side of the tracks, presenting a slight-moderate negative effect on journey characteristics for occupants' depending on their specific needs to access community facilities using the existing access across the bridge"*.

1. Compensation

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

2. Access

It is not possible to provide access to the railway station via the existing Irish Rail maintenance depot from McGrath's Lane for the duration of the construction phase. This is a heavy maintenance facility which is a high-risk environment with strict safety controls and practices. Staff are highly trained, regularly briefed and wear necessary protective equipment.

There are multiple daily movements of heavy goods vehicles, forklifts, cranes and other machinery which would pose an unacceptable risk to members of the public who may wish to traverse the site at short notice.

The depot footbridge passes through the maintenance building and provides unimpeded access to the multiple running lines within the depot. Underfoot conditions may regularly be unsuitable due to spills of oils, lubricants or other liquids or chemicals.

For these reasons, access cannot be permitted.

3. Summary of Issue Raised

The submission notes that due to the immediacy of the proposed large substation, at Drogheda, to Chanticleer, our client (Conor Rock) is understandably concerned regarding the

potential for impact from electromagnetic fields (EMF). The EIAR Chapter 22 identifies “*local residents and community*” as a potentially sensitive receptor for EMFs.

Furthermore, section 22.4.1 of chapter 22 does not include the area around Drogheda MacBride railway station in its assessment of the receiving environment in respect of EMF.

It is therefore respectfully submitted that appropriate mitigation measures are included in Chapter 22 of the EIAR to make specific reference to Chanticleer to ensure no significant negative direct or indirect impacts arise from the operational phase of the Proposed Development.

Response to Issue Raised

The Applicant understands the concerns raised in the submission. The potential for effects from EMF as a result of the Proposed Development has been considered and a comprehensive assessment is presented in Chapter 22 of the EIAR, which accompanies the Railway Order application.

Chapter 22 references that the local residents and community, among others, are potentially sensitive receptors for EMFs and includes a detailed assessment of the potential for significant effects on these receptors.

At the outset of this study, a categorisation of receptors in respect of sensitivity was undertaken, as detailed in Table 22-5 of Chapter 22 of the EIAR, where residential areas (not containing specific medical equipment) are considered to have a low baseline rating, meaning that it is normally not expected that these areas are affected by EMFs produced by substations. This is corroborated by the fact that there is an existing operational 10 kV substation in proximity to the property at Chanticleer, in the Drogheda depot building (the depot building being closer to the location than the new traction substation at Drogheda will be located, approximately 110 m away from Chanticleer).

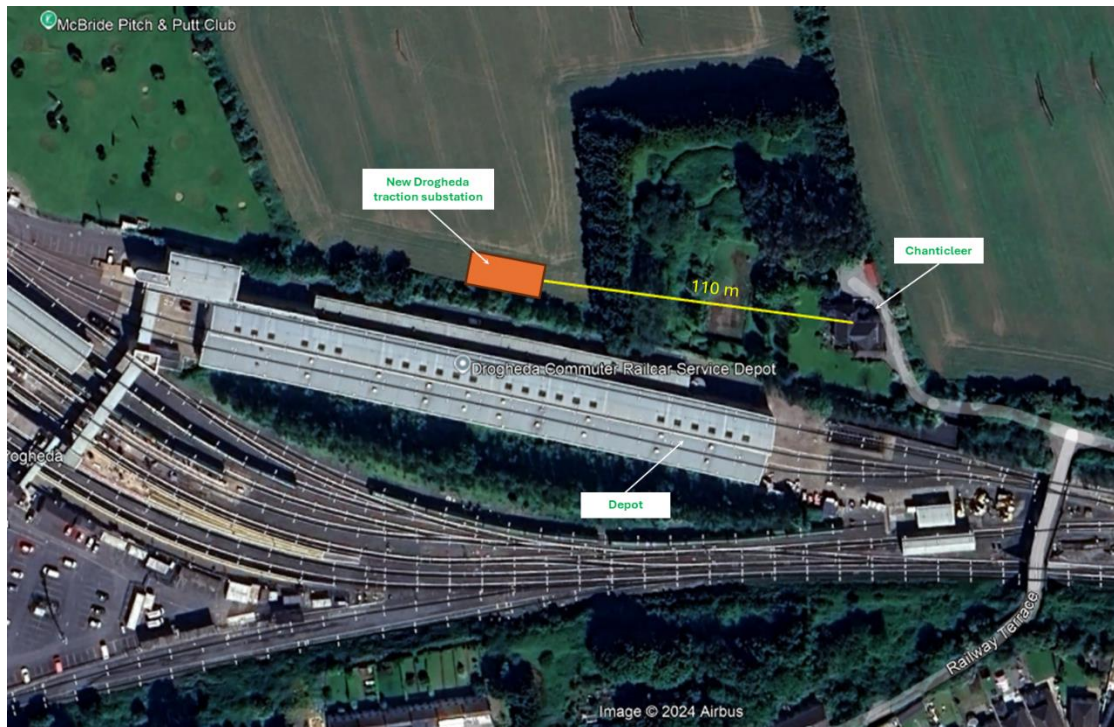


Figure 24 – Extract showing distance of Proposed Substation and Depot relative to Chanticleer Property

Secondly, the Applicant notes that the expected steady-state magnetic field produced by the new traction substations in the DART+ Coastal North Project significantly reduces once the distance between any potential receivers and the source of the traction power (namely, the substation compound, the track feeders and the OHLE) reaches 13 m, as detailed in section 22.4.3 (Desktop Study Analysis) of the EIAR. This conclusion is reached based on the EMF simulations presented in section 22.4.2 (Desktop Study Results) of the EIAR.

The Applicant would further note that the relevant sources of EMFs are the elements of the traction power system (namely, the substation compound, the track feeders, and the OHLE). This is the basis for the assessment in Chapter 22 of the EIAR, including the Desktop Study and the Baseline Survey.

In Drogheda MacBride railway station, there are no elements that are part of the traction system, only a LV electrical system for the electrical distribution across the station, which poses no EMC concerns whatsoever.

Finally, the Applicant notes that, as explained above, no mitigation measures are demonstrably required for any of the electromagnetic environments adjacent to the traction power system of DART+ Coastal North, including the residential electromagnetic environment where the Chanticleer is located.

4. Summary of Issue Raised

The submission notes that Section 4.10.5.1, Chapter 4 of the submitted EIAR provides details of the Drogheda substation proposals. It states that: *"The proposed site location is not within the existing IE property boundary and therefore acquisition of third-party land will be necessary to accommodate the substation. The site is bounded by Drogheda Depot access road to the south and agricultural land to the north, east and west."* (JSA emphasis).

The submission states that this statement is incorrect. The site location is immediately to the west of our client's ownership boundary and therefore this description should be updated to reflect the presence of a residential perimeter adjoining the substation site to the east.

Response to Issue Raised

The Applicant acknowledges the error in this regard in Section 4.10.5.1 and takes this opportunity to correct the statement as follows:

"The proposed site location is not within the existing IE property boundary and therefore acquisition of third-party land will be necessary to accommodate the substation. The site is bounded by Drogheda Depot access road to the south, by agricultural land to the north, a pitch and putt club to the west and by two residential properties to the east."

While the Applicant acknowledges this inadvertent error, the assessments in the EIAR remain unchanged and have included an assessment of the Proposed Development on these residential properties.

5. Summary of Issue Raised

The submission notes the concerns of the landowner, Mr. Rock, relating to the height and mass of the leylandii trees adjacent to the western boundary and c. 10 meters from the proposed location of the large substation. It is suggested in the submission that safety issues will inevitably arise in a storm event with the possibility of the trees falling onto the proposed substation.

On the basis of the potential hazard that the presence of the tree belt could present to the proposals, our client respectfully requests that Irish Rail facilitate the removal of a section of trees at the western perimeter and the construction of a 2 metre high block wall along the length of the perimeter.

Response to Issue Raised

As noted in EIAR Chapter 15 Section 15.3.5.1, there has been considerable discussion between the landscape and visual specialists and the engineering design team to establish the expected impacts on trees and vegetation, inform the design development and establish suitable mitigation measures. The design has developed to limit impacts on trees and vegetation where possible. The assessment and design development has been based on both

desk study and site investigation by the landscape and visual specialists of tree positions, sizes and approximate expected root areas.

The substation building itself is approx. 20m away from the tree line at its closest point. The trees are not considered to be of sufficient height and weight to cause significant damage in the event of one falling to both destabilise the substation and damage the equipment housed within. It is proposed to retain the hedge and tree line.

6. Summary of Issue Raised

The submission notes that the submitted drawing OBB80C – McGrath's Lane Overbridge Site Location Plan appears to suggest that a two-way road will be implemented extending to the entrance gates of our client's property, with no indication of landscaping or planting on either side of the road. This is not acceptable to our client who currently enjoys an established and attractive welcome to his home on the approach from the railway bridge, as shown below.

Response to Issue Raised

Mitigation measures for retention and protection of existing trees and vegetation, where possible during construction are specified in Section 15.6.2 of Chapter 15 of the EIAR. Mitigation measures for replanting – to match existing and/or use native species are specified in Section 15.6.3 of Chapter 15 of the EIAR. Refer to Figure 15.3 Landscape Mitigation for Drogheda MacBride Station and Surrounds, which details that the existing hedgerow is to be retained where feasible and replanted where necessary along the northern boundary of McGrath's Lane. See extract below.

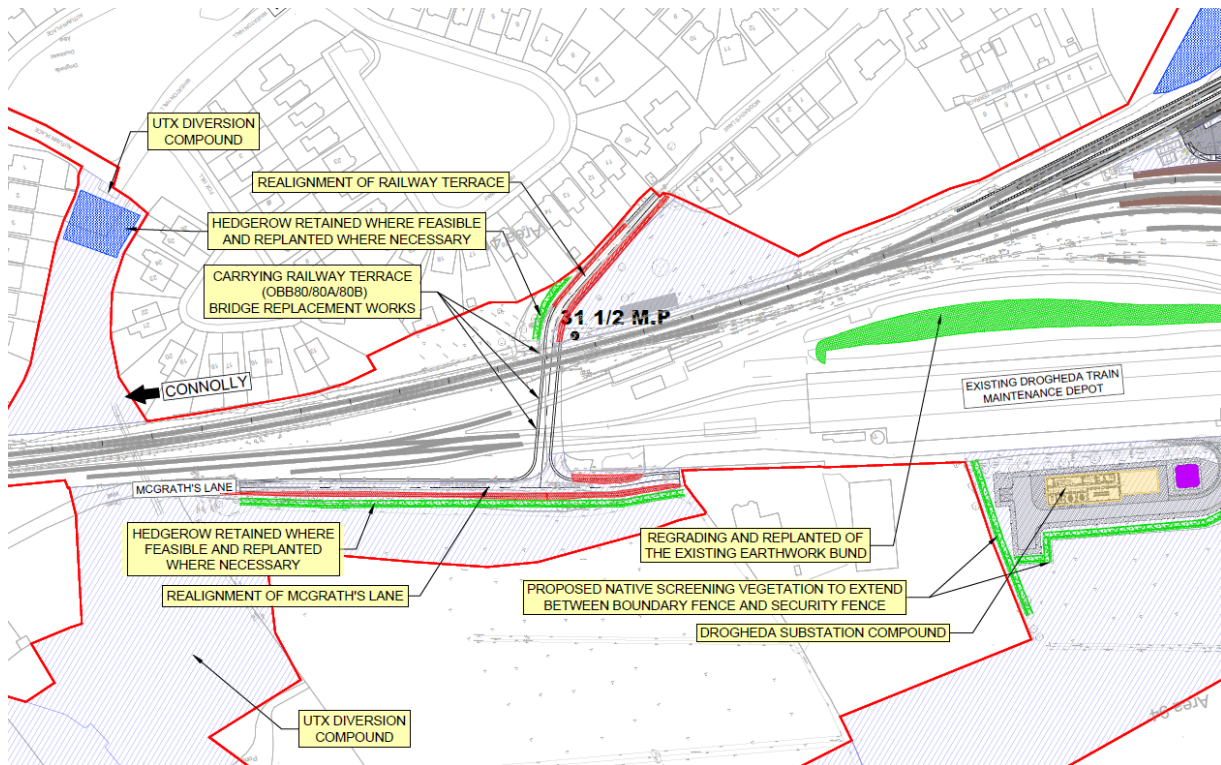


Figure 25 – Excerpt from Section 15 of the EIAR, Figure 15.3 Landscape Mitigation for Drogheda MacBride Station and Surrounds

7. Summary of Issue Raised

The submission suggests that a much greater level of detail should be provided within the submitted plans having regard to the compulsory purchase of the lands and the intended appearance of the 'new' McGrath's Lane when completed as part of the proposals.

Response to Issue Raised

Full details of the proposed works are provided in the Railway Order application and the associated plans, particulars and drawings. The proposed works in this area are as described in Chapter 4 Description of the Proposed Development in the EIAR (in particular Section 4.10.4.1) and are shown in the Railway Order Book 3 Specific Location 13 Drogheda Set 3 of 4.

Photomontages are also presented in the EIAR Vol 3B (Photomontages) Figure 15.3.56.1 to Figure 15.3.59.2. As set out in Chapter 15 Landscape and Visual Effects, Section 15.3.3.1.13, the intent is to provide a best-fit presentation which assists in illustrating the principal effects of the Proposed Development at a stage approximately 10 to 15 years post completion of construction.

The approach to landscape is as set out in the response to item 6 and as generally specified, as appropriate to the location, in Sections 15.6.2 and 15.6.3 of Chapter 15 of the EIAR.

These details have enabled a thorough assessment of the potential effects of the Proposed Development as presented in the Railway Order application. This assessment presented in Chapter 15 Landscape and Visual Effects of the EIAR, was prepared in accordance with relevant legislation and best practice guidance and by competent experts as set out therein. The assessment concludes that with the implementation of mitigation measures, there will be impacts to this property.

It is acknowledged that there will be continuing effects to Mr. Rock's property (not related to land take), from impacts outside the property boundary including removal of associated planting and regrading of the access to the property. There will also be a reduction in visual amenity due to the proximity of the new McGrath's Lane overbridge to the property. The sensitivity is medium / high and the magnitude of change is medium. The landscape / townscape and visual effect of the Operational Phase on this residential property will be Moderate, Negative, Long-term.

8. Summary of Issue Raised

The Observer makes reference to Built Heritage / Conservation in relating to the existing Railway Terrace Bridge OBB080.

The submission wishes to highlight the historic importance of the existing Railway Terrace bridge. A recent photograph of the structure is included in the submission noting its heritage character emanating from its stone construction.

Response to Issue Raised

Wherever a bridge spans over the railway it is necessary to ensure that the OHLE passes safely below the bridge. The bridges on the approach to Drogheda MacBride Station, namely the masonry arch bridges OBB80, OBB80A and OBB80B which carry McGrath's Lane over the railway line do not provide the necessary clearance for OHLE. A range of options to reduce impacts have been considered. The options include modifications to the track layout and structural solutions to gain the necessary vertical and horizontal clearance. The options considered include the following (either standalone or in combination):

- Provision of specialist electrical solutions for the OHLE with reduced clearance;
- Lowering the rail track under the bridge;
- Modification of the existing bridge structure;
- Removal of the existing structure and provision of a replacement structure.

In selecting the Preferred Option proposed for OBB80/80A/80B, the Applicant followed the process set out in Chapter 3 Alternatives of the EIAR, as detailed in Section 3.5.1.4 in particular.

The Applicant would also like to highlight the Option Selection Report Volume 1 (this is also included as Appendix A3.4 in Volume 4 of the EIAR). This describes in detail the options considered and assessed as well as the rationale for the decisions made. Further detail on the option selection process that OBB80/80A/80B went through is also described in the Option Selection Report (Volume 2: Technical Report Section 4) and is detailed in Annex 3.2 E Section 5. These were published and presented during the second round of public consultations held between 09th May 2023 and 23rd June 2023. The Option Selection Report (Volume 1 and 2) and Annexes are now also included as an appendix to this document and can also be viewed on [dart-coastal-north-public-consultation-no-2-useful-material-and-downloads](#).

As explained in Annex 3.2E5, OBB80/80A/80B the existing vertical clearance beneath these structures is insufficient to accommodate electrical wiring without some form of physical intervention (to either the track below or the bridge itself). Three options were shortlisted and following the Multi-Criteria Assessment, Option 1 (new bridge in existing location) was identified as the preferred option.

Consultation with the Louth County Council (LCC) Heritage Office was also undertaken during the design development stage. Brendan McSharry of LCC Heritage Office confirmed that none of the structures presented to LCC are listed as protected and noted that while the interventions should be considerate, they should not prevent the installation of a well-designed solution which provides for the infrastructure necessary for the Project and should encourage active means of travel.

Chapter 21 Architectural Heritage of the EIAR, has assessed the potential effects on Architectural Heritage arising from the proposal to remove and replace OBB80/80A/80B during both the Construction and Operational Phases.

OBB80/80A/80B are of architectural heritage interest as they are noted on historic maps. The removal and replacement of OBB80/80A/80B, as visually demonstrated in photomontage viewpoint D1 (Figure: 15.3.55.2 in EIAR Vol 3B (Photomontages), is as explained above required to facilitate sufficient overhead clearance for the extended OHLE to Drogheda. They are of medium sensitivity. The magnitude of the impact of their removal and replacement is high. The residual Construction Phase impact is Direct, Negative, Significant, Long term (EIAR Chapter 21 Table 21-13).

The proposed removal of OBB80/80A/80B Newtown Bridges McGrath's Lane will have a negative visual impact on Drogheda MacBride Station (BH-146), the magnitude of which is low. The potential Operational Phase impact is Indirect, Negative, Slight, Long term.

9. Summary of Issue Raised

The submission notes the concern of the landowner with respect to the potential for depreciation of property value as a result of the Proposed Development.

Response to Issue Raised

If the Railway Order is granted compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

10. Summary of Issue Raised

The submission notes Figure 1.6 shows that there is a considerable difference in height between the existing and proposed road levels on McGraths Lane to the east of the overbridge (approximately 3m). This will result in a significant gradient change along the access to our client's property. There is also a 7.2% gradient proposed to the west of the overbridge.

We note there are no detail provided as to the design of this temporary access route in term of cross section and alignment and our client would request detail of same to be provided.

Response to Issue Raised

McGrath's Lane East would increase in height by a max. of 2.8m, and West by 1.2m. The gradient on the East is proposed to change from 4.4% to 8% and on the West is proposed to change from 4.6% to 7.2%. The Applicant notes the following extract from the Design Manual for Urban Roads and Streets (DMURS), which states that: *"A maximum of 5% is desirable where pedestrians are active. In hilly terrain, steeper gradients may be required but regard must be had to the maximum gradient for wheelchair users of 8.3%".* As the proposed gradients are less than the maximum gradient noted, the Applicant considers that the design is compliant with the relevant design standard.

11. Summary of Issue Raised

The submission notes that their client is seeking to meet with Irish Rail (CIE) to seek to resolve these concerns in advance of an Oral Hearing on the proposed scheme and to hopefully present an agreed outcome to the Board in respect of same.

It also notes that service vehicles and pedestrians currently access the Irish Rail maintenance shed from the rail station. This area can also be accessed from McGrath's Lane as outlined earlier. Making this route available for our client during the construction phase would

significantly reduce the adverse and significant impact of the Proposed Development construction phase on our client.

Response to Issue Raised

It is not possible to provide access to the railway station via the existing Irish Rail maintenance depot from McGrath's Lane for the duration of the construction phase. This is a heavy maintenance facility which is a high-risk environment with strict safety controls and practices. Staff are highly trained, regularly briefed and wear necessary protective equipment.

There are multiple daily movements of heavy goods vehicles, forklifts, cranes and other machinery which would pose an unacceptable risk to members of the public who may wish to traverse the site at short notice.

The depot footbridge passes through the maintenance building and provides unimpeded access to the multiple running lines within the depot. Underfoot conditions may regularly be unsuitable due to spills of oils, lubricants or other liquids or chemicals.

For these reasons, access cannot be permitted.

5.5.2 SB0064 – Greenwalk Homes Ltd.

Representative: John Spain Associates

Submission Location – Bettystown

1. Summary of Issue Raised

The submission raises concerns regarding the proposed undergrounding of MV infrastructure across their lands at Pilltown Road, Bettystown.

Greenwalk Homes Ltd requests that any grant of permission for the proposed undergrounding works under the Railway Order application (as may be issued by the Board in future) be appropriately conditioned to have regard to the future road network layout on Greenwalk's site as may be permitted, under a live planning application on the site (i.e, MCC Reg. Ref. 2460334) or otherwise.

Response to Issue Raised

The Applicant acknowledges the concerns raised by Greenwalk Homes Ltd and reaffirms its commitment to collaborate with the developer to ensure the proposed undergrounding works are appropriately integrated with any approved development plans for the site.

The proposed diversion of the existing overhead MV (Medium Voltage) line at Pilltown Road, Bettystown, is a critical component of the DART+ Coastal North Project, enabling the electrification of the railway line. This diversion is required as the existing overhead MV line crosses the railway to the north of Underbridge UBB76. The plan includes rerouting the line

underground along Pilltown Road (L5615), passing under UBB76, and reconnecting to the existing overhead lines, as detailed in Chapter 5 Construction Strategy of the EIAR, in particular, Section 5.7.5.1, Image 5-117.

At the time of submission, no planning permission for the Proposed Development on Greenwalk's site had been granted.

The current design safeguards the diversion route needed to support the Project's timely delivery.

In the event that planning permission is granted for the development under MCC Reg. Ref. 2460334 or subsequent permissions, the Applicant is happy to engage further with Greenwalk Homes Ltd to identify how the required diversion can proceed with minimal impact on any future plans of the developer.

2. Summary of Issue Raised

The submission raises concern over the absence of a train station along the existing railway line at Bettystown as part of the Railway Order application.

It further notes that the DART+ Coastal North Railway Order application poses a significant opportunity to develop a station along the line to exclusively serve the Bettystown area and communities living and working in the town – this is seen as a missed opportunity. The introduction of a station at Bettystown would encourage increased active travel, with spin off economic and environmental benefits for commuters and the area respectively. Its establishment would help facilitate the recent and future expansion of the town population through added amenities and facilities to serve the wider area, and present further growth opportunities through Transport Orientated Development by unlocking the development potential of substantial greenfield lands to the east of the existing rail line, in accordance with national, regional and local planning policy objectives, and the proper planning and sustainable development of the area.

Response to Issue Raised

The delivery of new stations is not included as part of the DART+ Coastal North Project which will, if required, be progressed by Iarnród Éireann as separate projects. The DART+ Coastal North Project does not preclude any future development of any potential new stations, such as that proposed at Bettystown in the East Meath Local Area Plan, along the Northern Line.

5.5.3 SB0076 – J Murphy Construction Limited / Ravala Limited

Representative: Ray Ryan (BMA Planning)

Submission Location – Drogheda

1. Summary of Issue Raised

The submission notes that the proposed land acquisitions for embankments, substations, and temporary compounds would result in the loss of valuable land zoned for high-density development adjacent to Drogheda MacBride Station.

The proposed substation location involves permanent acquisition of prime land, which the submission argues is unsustainable and contrary to planning objectives, requesting relocation to more suitable lands.

Response to Issue Raised

One of the main objectives of the DART+ Coastal North Project is to deliver a higher frequency, higher capacity electrified rail service between Drogheda and Dublin City Centre and to support the rapid transition required to deliver on a low carbon climate resilient transport system. As such it is an infrastructure project of national importance.

The Project aligns with and is indeed referenced within relevant national, regional and local policy documents as detailed in Chapter 2 Policy Context of the EIAR. In particular, in respect of the points noted in the submission, the Louth County Development Plan 2021 – 2027 recognises that the “DART Expansion Programme” is an important growth enabler for Drogheda as it would improve the connectivity to Dublin due to the increased frequency of services, making the town more accessible and attractive for economic investment and employment generating development.

In respect of zoning, it is noted that the lands in question are within lands zoned as J1 – Transportation Development Hub in the current Louth County Development Plan 2021 – 2027. This zoning objective includes several types of development aimed at enhancing connectivity and promoting sustainable urban growth.

The Proposed Development focusses on enabling an increased modal shift to public transport through the extension of the DART to Drogheda and the increase in capacity and frequency of the service. In so doing, it also better facilitates transit-oriented developments in the vicinity of the station, such as those noted in the submission. This development is therefore considered to be in accordance with the zoning objective as set out in the Development Plan.

2. Summary of Issue Raised

The submission notes that the reconstruction of McGrath's Lane Overbridge would unnecessarily acquire prime urban land, and the proposed embankments could be replaced with retaining walls to reduce the land impact. Extract below showing Murphys alternative

proposal.

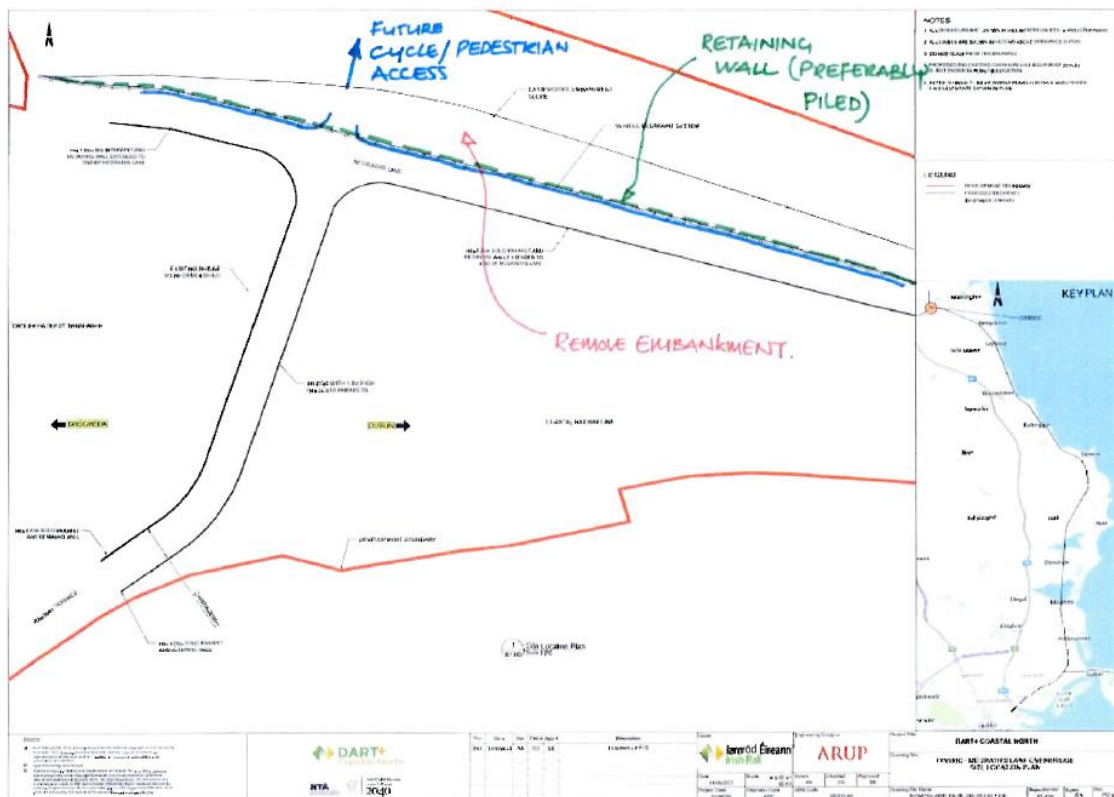


Figure 26 – Alternative Bridge Reconstruction Proposal from Submission SB0076

Response to Issue Raised

The design has been developed to adopt a sustainable and cost-effective solution. This meant that, in this location, earthwork embankments were selected as the most appropriate solution. The earthworks solution is a more economical solution for the Project (reduced capital cost), a more sustainable solution (reduced carbon footprint) and an enhanced solution from a biodiversity perspective (we are retaining the existing hedgerow).

3. Summary of Issue Raised

The submission notes that the proposed location of the temporary construction compounds sterilises a large portion of the clients' lands, delaying planned development. Alternative, unzoned lands are suggested for these purposes.

The submission also notes that the extent of the temporary land take sought appears excessive and it is irregular in shape leaving the entirety of the subject lands either sterilised or effectively sterilised for the period of the construction of the DART+ Coastal North Project which will remove the landowner's ability to develop the lands.



Figure 27 – Extract from SB0076 showing purported Sterilised / Effectively Sterilised Lands

The submission notes for example, that there are other suitable lands in the area, including un-zoned lands owned by Louth County Council to the east of the Newtown Access Road and west and south of the Drogheda Wastewater treatment Plant, which are convenient for the DART+ project – see lands identified as “I” on Fig above. Other potential locations include the undeveloped industrial lands to the north off Marsh Road and the Pitch and Putt course. There are also large, underutilised areas within the CIE lands around MacBride Station which could reduce the extent of the compounds required. There is no indication that the alternative options have been adequately assessed

Response to Issue Raised

The Applicant fully understands the concerns raised in the submission by the prospective developer of the lands in question. The Applicant does however note that, it would appear, at the current time, that no planning permission exists for any development within these lands.

Notwithstanding, consultation has been undertaken with the landowners with respect to the Proposed Development, to ensure that the Applicant has addressed their concerns to the extent possible prior to the Railway Order application submission.

The Project team has engaged directly with this property owner since it became apparent that lands registered to them would be impacted by the Project boundary. Initially, as part of a wider mail-out to all properties in the Project area, a leaflet was distributed to this property at the start of the Public Consultation No.1 (PC1) in Q3 2022. A letter and leaflet were sent to the landowner following identification of substation locations as part of PC2 documentation in Q2 2023, notifying them that their property was within the extents of the Project boundary.

Prior to this notification there had been consultation with the landowner in relation to permission to carry out environmental surveys on its lands.

A summary of key communications is presented below to demonstrate the efforts to engage with the landowner:

- 2023-04-25: Initial landowner engagement meeting to discuss the proposals presented in PC2 and provide clarification to queries raised.
- 2023-07-20: Follow up meeting to discuss iterations to the design and extents of landtake further to the initial meeting and email correspondences.
- 2023-10-24: Follow up meeting to discuss iterations to the design and extents of landtake further to the previous meeting and email correspondences with a view to addressing landowner concerns and reaching approval in principle for the DART+ Coastal North proposals.

Further to the above, additional email correspondences and a number of design iterations, such as those described in Chapter 3 Alternatives of the EIAR (see Chapter 3 section 3.6.2), have helped move the consultation along to a point where approval in principle had, in the Applicants view, been reached with the landowner. Some email and telephone correspondences in relation to survey access requests have also taken place during the design development.

In developing our design, the temporary land take was identified with consideration for the space required to reconstruct the McGraths Lane bridge, construct the new Drogheda substation and support the line-wide works around Drogheda and on down the line towards Laytown. The area identified is that which is considered reasonable so as to not unduly limit the contractor's ability to deliver the works.

Prior to the initial consultation with the landowner the construction compound was located adjacent to the railway corridor, however following feedback from the developer the main compound was moved to the north of the field to allow for the developer's proposed first stage of development (again noting this does not have planning permission).

If the developer's proposals have changed, the Applicant remains willing to work with them to come to an arrangement that works for all.

In respect of the alternative sites suggested, the Applicant notes as follows:

- 1) Locating a compound to the east of the Newtown Access Road would involve construction plant regularly crossing the public road, creating a safety risk.
- 2) Locating a compound north of Marsh Road would involve construction plant regularly crossing an even busier public road, creating a bigger safety risk.
- 3) Locating a compound on the pitch and putt course would remove a public amenity.

Please refer to EIAR Volume 2: Chapter 5 Construction Strategy, Section 5.8 for further detail on the construction plans for the Drogheda area.

4. Summary of Issue Raised

The submission notes that the Environmental Impact Assessment Report (EIAR) lacks sufficient evaluation of alternatives for the substation, embankments, and construction compounds, failing to consider impacts on high-density urban development.

Furthermore, the observer notes that the landowner considers that the justification and rationale for the permanent acquisition to accommodate the ESB Substation is inadequate and does not support the acquisition of our clients' lands as part of the Railway Order.

Response to Issue Raised

The Applicant notes that the Proposed Development provides for the electrification and re-signalling of the existing railway. To provide electrical power to the trains, overhead line equipment (OHLE) and electrical substations will be needed. Findings from a traction power study indicated that eight new substations are required between Malahide and Drogheda to provide power to the electrified network.

Chapter 3 Alternatives of the EIAR (see Section 3.3 in particular) provides an overview of the alternatives considered and describes in detail the process followed. Section 3.4 of the EIAR describes the stakeholder engagement and consultation undertaken during the design process. This section also references the key documentation published during the non-statutory consultations and the Applicant would like to highlight in particular the Option Selection Report Volume 1 that can be found on the www.dartplus.ie webpage (this is also included as Appendix A3.4 in Volume 4 of the EIAR). The full Option Selection Reports are also now included as an appendix to this report. This describes in detail the options considered and assessed as well as the rationale for the decisions made.

As outlined in Chapter 3 of EIAR, Section 3.5.2, the siting of each substation within any general area has considered the following:

- The land-use and development context of potential locations;
- The substations will be located adjacent to the railway line in the form of a fenced compound surrounding a single storey building which will house all the necessary electrical switching and feeding equipment;
- The substations will be connected to the local power distribution network and the OHLE system using insulated cables. These cables will be installed in buried routes for additional protection;
- The substations will need to be accessible from the local road network for construction and maintenance purposes; and
- The footprint of each substation compound and requirement for the building to house the electrical equipment for both IÉ and ESB.

While every effort has been made to contain the necessary works within existing IÉ owned lands, this has not always been possible. Where works are required outside of IÉ lands, lands required for Construction Compounds will typically be on a temporary basis while the lands required for the substations will be on a permanent acquisition basis.

The outputs of the power study indicated that the study area for a substation at Drogheda extended from the end of McGrath's Lane to the Marsh Road Pay & Display car park. Nine options were considered within this study area with six options taken forward to the detailed multi-criteria assessment (MCA). The Preferred Option which is the subject of this RO application was identified as such based on economy, environment, and integration criteria. The Option Selection Report Volume 2 Technical Report presents the detail of the option selection process which has led to the choice of the Preferred Option. This was published as part of the second non-statutory public consultation and is referenced in the EIAR - Appendix A3.4 (Options Selection Report Volume 1 - Preferred Options Report).

The Applicant acknowledges the concerns of J Murphy Construction Limited / Ravala Limited (MCL / RL), and points towards a period of extensive consultation with MCL / RL carried out during the Project development as detailed above, where numerous iterations of the Project design were developed further to feedback with a view to minimising potential impacts on MCL / RL lands and their future plans.

5. Summary of Issue Raised

The submission notes that the form and design of the substation compound is incompatible with the future development of the western portion of the lands for high density urban development adjacent to a railway station. In addition to the lands to be acquired, there is a very significant impact on the retained lands as a result of the retaining walls c.3.5 meters above the existing ground level which will very severely impact on the type and extent of development permissible at this location when compared to the "no scheme world".

The submission further contends that the footprint and the associated land take of the substation compound is excessive.

Response to Issue Raised

The substation compound is a fundamental element of this Project, as it is required to ensure the reliable delivery of the increased energy capacity necessary to support the electrification of the DART+ network. This infrastructure is critical to realising the transport-oriented development goals for the area and accommodating the anticipated population and economic growth.

While the compound occupies part of the lands, the retained lands will still support high-density urban development. The substation's proximity to the railway station ensures alignment with the area's strategic vision of integrated transport and urban planning. Without this infrastructure, the area's potential for development in a sustainable and efficient manner would be significantly constrained.

The retaining walls, with a height of approximately 3.5 metres above the existing ground level, are a necessary engineering solution dictated by site-specific conditions required to achieve electrification clearance under OBB80C. It is unclear how the retaining walls may impact the retained lands as they are provided on the railway side of McGrath's Lane, and along Railway Terrace to avoid impacting on local residents' rear gardens. Therefore, their presence does not preclude high-quality development to the lands to the north. The DART+ Coastal North Project team is committed to implementing mitigation measures such as landscaping and design features to minimise the visual and functional impact of the retaining walls and integrate them into the urban environment.

The footprint of the substation compound has been carefully considered to minimise the necessary land take while having the ability to meet the current and future energy needs of the DART+ Coastal North network. The scale of the compound reflects the anticipated increase in energy demand arising from the electrification of the railway it will enable. Reducing the footprint could compromise the substation's ability to deliver the required capacity, which would undermine the long-term viability and effectiveness of the DART+ Coastal North Project. Every effort has been made to minimise impacts on the retained lands while ensuring the Project delivers the infrastructure necessary to support sustainable growth.

The "no scheme world" scenario proposed in your submission does not account for the fundamental need for the DART+ Coastal North infrastructure to unlock the area's development potential. Without this critical infrastructure, high-density development adjacent to the railway station would face severe limitations due to insufficient sustainable transport options. The substation is not an obstacle to future development but rather a key enabler of it, facilitating sustainable urban intensification and connectivity.

It is important to reiterate the wider benefits of the DART+ Coastal North Project. By electrifying and enhancing the railway network, the Project will reduce reliance on private car travel, lower carbon emissions, and significantly improve connectivity for communities along the corridor. The substation compound is an indispensable component of this broader vision, and its design has been optimised to balance functionality with land use considerations.

6. Summary of Issue Raised

The submission calls for enhanced pedestrian and cycling connections to Drogheda MacBride Station, particularly through an upgraded footbridge that integrates better with future development plans.

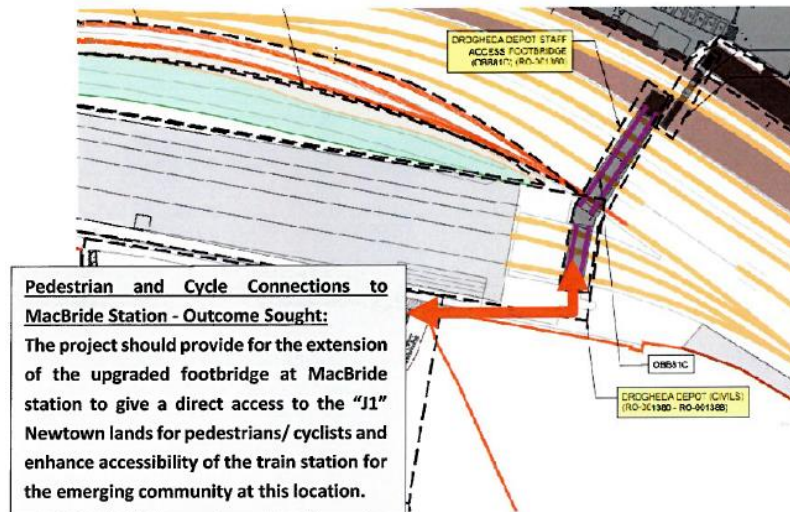


Fig 8: Suggested Provisions for Future Pedestrian/ Cycle Link to MacBride Station

Figure 28 – Excerpt from SB0038: Suggested Provisions for Future Pedestrian / Cycle Link to MacBride Station

Response to Issue Raised

The upgrade works proposed to OBB80/80A/80B aim to establish this connection as an active travel priority crossing, with local vehicle access to the two existing landowners along McGrath's Lane. This represents an enhanced connection for pedestrians and cyclists to use the existing connection via Railway Terrace from the Proposed Developments already under construction.

OBB81 is a connection to the Depot facility from the station and is not in use as a public connection. Shared access is not possible due to the risk of members of the public trespassing into the Depot.

5.5.4 SB0086 – Johnny and Grainne Dunne

Representative: John Spain Associates

Submission Location – Drogheda

1. Summary of Issue Raised

The submission notes that the landowners are generally supportive of the scheme but also have a number of concerns and are seeking changes to some aspects and clarification on other aspects of the scheme. Of particular importance to the landowners is the scheme's impact on their property and particularly in respect to access arrangements to same both during and post the construction of the Dart+ Coastal North scheme.

Response to Issue Raised

The Applicant acknowledges the concerns raised in the submission and appreciates the support of the DART+ Coastal North Project offered by the observer.

2. Summary of Issue Raised

The submission raises significant concerns in relation to the loss of continued access to the property of Johnny and Grainne Dunne during the construction phase of the Proposed Development, noting that the McGraths Lane overbridge (OBB080/80A/80C) will be replaced to provide sufficient vertical clearance to the proposed OHLE, and realignment of McGraths Lane will be required to suit the new proposed bridge design. The submission notes that temporary access to properties is proposed to be via an access road from the R150, as per 23.01.

The submission claims that there is insufficient information and proposals in respect of the practicalities faced by the landowners during the construction stage such as waste management and bin collection points, post and deliveries and alternative modes of transport available to our client during this phase.

The submission requests a solution be investigated to maintain vehicular and pedestrian access to the Dublin Road during the construction phase of development via the existing Irish Rail maintenance depot entrance from McGrath's Lane and route through the railway station.

It is proposed that at a minimum, pedestrian access to Dublin Road should be maintained between the landowner's property and the Dublin Road.

Response to Issue Raised

The Applicant acknowledges that for the duration of the construction phase of the Project in this location, there will be an impact both on journey distance and journey times for Mr and Mrs Dunne.

The current travel distance to the station is 900m (approximately 13 minutes' walk or 3 minutes' drive). The proposed route will more than double the travel distance and associated travel time to the station to 2.2km, via the new access road to the R150 and the narrow rail under pass along the R150, with an increased journey duration of approximately 28 minutes' walk or 7 minutes' drive. It is acknowledged that journey times (driving) are dependent on the time of day and associated levels of traffic.

The current travel distance to the town centre is 1.6km (approximately 22 minutes' walk or 5 minutes' drive). The proposed route will increase the travel distance and travel time to the town centre by approximately 30% to 2.2km, via the new access road to the R150, which is approximately 28 minutes' walk or 7 minutes' drive.

Temporary access restrictions will be managed with alternative safe routes provided, and Mr. and Mrs. Dunne will receive updates to minimise disruptions to social and family activities (as per the Construction Traffic Management Plan, which is included as sub-Appendix G to the Construction Environmental Management Plan, Appendix A5-1 in Vol 4 of the EIAR). Local authorities and service providers will also receive updates to ensure the ongoing provision of service is maintained to Mr and Mrs Dunne, such as waste management, post, deliveries and other services.

The Applicant explored all feasible options, which were assessed through longlisting, shortlisting and application of a multi-criteria assessment (MCA), which can be referred to within Annex-3-2-E5-OB80-80A-80B-Options-Report, with specific references provided below.

The option selection and design development identified that pedestrian access over the railway cannot be maintained during the construction of a new bridge adjacent to the existing one due to the requirement to demolish the current bridge to achieve the necessary vertical clearance for overhead line equipment (OHLE), interrupting the existing route (see Chapter 4 Description of the Proposed Development and in particular, Section 4.1.3 therein).

Additionally, creating a temporary pedestrian crossing is not feasible due to space limitations, safety risks posed by construction traffic, and the challenges of ensuring compliance with safety standards in the constrained site environment (see Section 4.1.5 of the EIAR). Furthermore, the extensive road reconfiguration and earthworks required for the new bridge alignment exacerbate the difficulties of maintaining pedestrian access during the works (Section 4.1.6 of the EIAR).

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>.

A chartered valuation surveyor experienced in compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

3. Summary of Issue Raised

The submission refers to an historic entrance to the affected property (accessed from the northeast corner, with historic gate remnants still intact at the perimeter of the dwelling.)

The submission suggests that *“As an alternative option to the landowner utilising the temporary compound construction traffic route to the west of Newtown Lodge and north*

through the adjacent field, it is respectfully submitted that the Railway Order is amended to provide Mr. & Mrs. Dunne direct access to the completed road to the northeast which serves the unoccupied residential development at Newtown View”.

Response to Issue Raised

The Applicant has considered the proposal to provide direct access for Mr. and Mrs. Dunne to the completed road at Newtown View but this is not deemed feasible for a number of reasons. For one, the proposed access route crosses land under third-party ownership, which is not included in the Railway Order application. The existing historic entrance and gate remnants may also be of architectural heritage interest, given the regional medium sensitivity of Newtown Lodge which complicates the implementation of such changes. Furthermore, the proposal introduces challenges in integrating the new access with ongoing construction plans and traffic management, while ensuring compliance with planning and environmental regulations. Given these constraints, the amendment cannot be accommodated within the scope of the current project.

4. Summary of Issue Raised

The submission raises concerns relating to Health and Safety. The proximity of the construction compound and extent of demolition and construction works associated with OBB080 is noted as presenting a safety hazard to the landowner’s family and introduces restricted visiting due to the Project. These are all real and valid concerns arising from the proposals which will have a direct impact upon the social and family life of the landowner and require a proportionate level of consideration by Irish Rail in these proposals.

Response to Issue Raised

The concerns regarding health and safety due to the proximity of the construction compound and the demolition/construction works at OBB080 are noted. The Applicant is committed to ensuring the safety and well-being of Mr. and Mrs. Dunne, their family, and visitors through the following measures as detailed in the EIAR that accompanied the Railway Order application:

Construction Compound Safety: Secure fencing, controlled access, and clear signage will be implemented to prevent unauthorised access and ensure public safety (EIAR Chapter 5, Section 5.3.3).

Demolition and Construction Safety: All works at OBB080/80A/80B will adhere to stringent health and safety regulations, with measures to manage noise, vibration, and dust impacts (Chapter 5, Sections 5.2.2 and 5.10).

Access and Visiting: Temporary access restrictions will be managed with alternative safe routes provided, and Mr. and Mrs. Dunne will receive updates to minimise disruptions to social and family activities (EIAR Vol 4 – Appendix G).

Community Engagement: A dedicated Community Liaison Officer (CLO) will address concerns, provide updates, and collaborate with Mr. and Mrs. Dunne to implement tailored solutions (Chapter 5, Section 5.10).

These measures ensure that health, safety and Mr. and Mrs. Dunne's social and family life are prioritised during the construction phase, with robust protocols and open communication in place.

5. Summary of Issue Raised

The submission raises concerns in relation to the extent of impact on the landholding of Johnny and Grainne Dunne. The submission claims that *"the proposed land acquisition will dilute and impact upon the landowner's landholding to an unacceptable extent and clearly demonstrates the potential for disturbance and disruption by both the construction and operational phases of the Railway Order works. This is not acceptable to Mr. & Mrs. Dunne and will have a serious and long-term impact upon the daily life of him and his family and the propensity to enjoy the privacy and amenity of their home. This should not be permitted given the architectural heritage of Newtown Lodge and its established residential use. It is noted that a recently completed residential development exists to the east at Newtown View, with little impact upon these dwellings and their curtilages in comparison to Newtown Lodge which will be surrounded on all sides by Irish Rail works, transport routes and the railway line itself. This is not a satisfaction situation for the landowner, and it is respectfully submitted that Irish Rail are required to review the draft Railway Order to minimise the significant and, in some instances, profound, impacts anticipated at the property as set out in the submitted EIAR"*.

Response to Issue Raised

The Applicant acknowledges the concerns raised by Mr and Mrs Dunne in the submission.

The Applicant notes that the main works in the vicinity of this residence include the construction of the proposed Drogheda Substation and the reconstruction of OBB80/80A/80B Railway Terrace Bridge. There are also some minor works to the depot at Drogheda. These works are described in detail in the Railway Order application, in Chapter 4 Description of the Proposed Development and Chapter 5 Construction Strategy of the EIAR as well as in the accompanying drawings.

In respect of Mr and Mrs Dunne's concerns about the impact on their residential amenity during construction, the Applicant notes that a comprehensive assessment of the potential effects of the Proposed Development has been undertaken and is presented in the EIAR which accompanied the Railway Order application. This assessment was carried out in accordance with the relevant EU and national legislation and best practice guidance. A suite of mitigation measures has been identified to ensure that environmental impacts are minimised through the construction period. These are all documented in the individual chapters of the EIAR and in Chapter 27 Summary of Mitigation and Monitoring Measures.

A detailed Construction Environmental Management Plan (CEMP) has also been prepared and is included in Appendix A5-1 of the EIAR. This details how the construction of the Project will be managed throughout construction to minimise environmental impacts. This Plan will be further developed by the Contractor prior to construction in consultation with the relevant authorities.

Impacts on residential amenity are addressed in Chapter 7 Population of the EIAR. This identifies that at least very significant noise effects prior to mitigation are predicted for the closest residential receptors (including those properties on McGraths Lane) affecting residential amenity. The assessment concludes that even with the implementation of mitigation measures, significant residual effects are identified for the construction works, due to the bridge works in Drogheda (OBB80/80A/80B). These works will be temporary albeit it is acknowledged that the works will be over an extended period.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take several factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

6. Summary of Issue Raised

The submission raises concerns over the potential for significant Noise, Vibration & Air Quality impacts at the property of Johnny and Grainne Dunne as a result of the Proposed Development works and the proximity of their property to significant interventions forming part of DART+ Coastal North.

The submission notes that the landowner is greatly concerned about the potential impact on his property and residential amenity arising from the Proposed Development during the construction phase given the proximity of the works proposed on McGrath's Lane and within the confines of the railway line.

Page 43 of EIAR Chapter 14 notes that the construction period of the proposed replacement Railway Terrace bridge will "take place over an approximately 18-month period". However, this is estimated to be approximately 104 weeks as set out in Table 1-7 of the submitted Construction Environmental Management Plan within the Appendices. The submission seeks clarification on the duration of construction works and the closure of Railway Terrace as this provides the primary and most time-efficient route to the railway station and Drogheda town centre.

Response to Issue Raised

The concerns regarding the potential impact on property and residential amenity during the construction phase are acknowledged by the Applicant. A comprehensive assessment of the potential effects of the Proposed Development has been undertaken and is presented in the

EIAR which accompanied the Railway Order application. This assessment was carried out in accordance with the relevant EU and national legislation and best practice guidance. A suite of mitigation measures has been identified to ensure that environmental impacts are minimised through the construction period. These are all documented in the individual chapters of the EIAR and in Chapter 27 Summary of Mitigation and Monitoring Measures.

A detailed Construction Environmental Management Plan (CEMP) has also been prepared and is included in Appendix A5-1 of the EIAR. This details how the construction of the Project will be managed throughout construction to minimise environmental impacts. This Plan will be further developed by the Contractor prior to construction in consultation with the relevant authorities.

1. Air Quality

Chapter 12 of the EIAR has assessed the likely significant effects of the DART+ Coastal North Project on Air Quality.

With respect to the construction phase, the air quality impact of the redistribution of local road traffic during road closures and from construction traffic has been assessed both locally and regionally. The assessment concluded that, given the temporary nature of the construction phase, the overall impact of NO₂, PM₁₀ and PM_{2.5} concentrations as a result of the Proposed Development is short-term and neutral.

In addition, the assessment considered the impact of construction dust. With respect to dust nuisance, a sensitivity assessment was completed in Section 12.4 of the EIAR and an assessment of the potential dust generation due to construction has been completed in Section 12.5 of the EIAR. Section 12.6 of Chapter 12 of the EIAR details the mitigation measures for the construction phase of the Project. The contractor will develop and implement an Air Quality Management Plan and this will be agreed with the respective local authorities prior to construction commencing. The Air Quality Management Plan will include appropriate dust mitigation measures and dust deposition monitoring.

At Drogheda specifically, the assessment concluded that when the dust minimisation measures detailed in the mitigation section of the Air Quality chapter are implemented, fugitive emissions of dust from the site are not predicted to be significant and pose no risk of dust nuisance or risk to human health or to ecological receptors. Thus, there will be no significant residual construction phase dust impacts.

2. Noise & Vibration

Chapter 14 of the EIAR assesses the likely significant noise and vibration effects of the proposed DART+ Coastal North Project.

The construction of the Drogheda Substation will be carried out over a relatively short timeframe, primarily during normal working hours.

The re-construction of OBB80/80A/80B will take place over an approximately 18-month period. Due to the importance of the Northern Line to commuters, it is intended that it will remain operational throughout the construction phase. Where possible works will be undertaken in safe zones during daytime periods. In certain circumstances full possession of the railway (i.e. no trains running) will be required and these will typically take place during weekend and night-time possessions. Given the location of the bridge, much of the work will need to be done during track possessions. It is expected that these will be a combination of weekend and night-time possessions.

The EIAR (Chapter 14 Noise & Vibration) identifies a suite of mitigation measures to mitigate the impact from noise and vibration during the construction phase. Appendix A5.1 in Volume 4 of the EIAR sets out the Construction Environmental Management Plan (CEMP) for the Proposed Development. It includes the approach to manage, mitigate and monitor noise and vibration during the Construction Phase.

The extent and nature of the construction noise impacts is dependent on activity (for example site clearance, ground investigation) and proximity to noise sensitive locations. The predicted noise impact from the construction activities was assessed against the thresholds of significance for construction noise. A list of activity-specific measures to mitigate the construction noise impacts if the threshold values are exceeded are outlined in Section 14.6.1 of Chapter 14 of the EIAR. By applying these mitigation measures the impacts of construction noise will be appropriately managed. There will also be ongoing community liaison channels (see below) in place during construction to respond to any specific concerns that arise.

When night-time works are required, they will be undertaken in accordance with the mitigation measures included in the EIAR, which aim to reduce impacts as much as possible. A Noise Management Plan will be part of the construction stage of the Project. Iarnród Éireann will ensure residents living near the rail line are informed of upcoming works and given advance notice of any disruptive works.

Even with the implementation of mitigation measures, the EIAR, Chapter 14 Noise & Vibration identifies that, where works occur in proximity to sensitive receptors, the resultant residual effects during the construction phase will likely be negative, moderate to very significant and temporary to short-term.

It goes on to state that, given the proximity of construction activity to some noise sensitive locations, the mitigation measures proposed may not be sufficient to fully mitigate the noise impact and that temporary accommodation will be offered to eligible owners/occupiers where the criteria in Table 14-4 as presented in Section 14.3.6.2 (within the EIAR) are met.

3. Residential Amenity

Impacts on residential amenity are addressed in Chapter 7 Population of the EIAR. This identifies that at least very significant noise effects prior to mitigation are predicted for the closest residential receptors (including those properties on McGraths Lane) affecting residential amenity. The assessment concludes that even with the implementation of

mitigation measures, significant residual effects are identified for the construction works, due to the bridge works in Drogheda (OBB80/80A/80B). These works will be temporary albeit it is acknowledged that the works will be over an extended period.

Furthermore, Chapter 23 Human Health of the EIAR assesses impacts to health as a result of changes to air quality during construction of the Project, and no significant effects are predicted. For further details, please refer to Section 23.8.1 of Chapter 23 of the EIAR.

4. Community Engagement

It is important to note that, as part of the construction strategy, a Community Liaison Officer (CLO) will be appointed for the duration of the Project. The CLO will be in place to communicate with the residents and to address any concerns raised by residents during the construction phase. The CLO will carry out communications activities, such as:

- to provide information to local residents about progress of the Project,
- to share noise and vibration monitoring results and explain noise mitigation measures being put in place,
- to inform the local community about works likely to cause significant noise or vibration and/or works planned to take place outside of core working hours,
- to inform of mitigations regarding the above issues.

5. Construction Period

The Applicant would like to clarify that the difference in the stated duration for the closure of Railway Terrace between the Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP) (24 months) and the Environmental Impact Assessment Report (EIAR) Chapter 14: Noise and Vibration (18 months) arises from variations in the scope and context of the timelines provided, as summarised below:

- EIAR Vol 4 – Appendix A5.1 – CEMP (Construction Environmental Management Plan), Section 2.2.7 – Construction Programme and Sequence:
 - This section outlines the overall construction timeline and includes a 24-month duration for works involving Railway Terrace, accounting for pre-construction enabling works, temporary land acquisition, active construction, and reinstatement phases.
- EIAR Vol 4 – Appendix G – CTMP (Construction Traffic Management Plan), Section 1.5.2 – Phasing:
 - The CTMP references a 24-month duration, reflecting the need for temporary traffic management measures as part of the broader construction programme. This includes periods when access may be disrupted intermittently or partially.
- EIAR Vol 2 – Chapter 14 – Noise and Vibration, Section 14.5.1 – Potential Construction Impacts:
 - This section identifies an 18-month duration specific to the demolition and reconstruction of OBB80/80A/80B

The difference therefore is primarily due to the broader scope considered in the CEMP/CTMP, which includes all phases of construction, from preparatory works to final reinstatement.

7. Summary of Issue Raised

The observations within the submission recognise the requirement for the replacement of OBB080 to facilitate additional overhead heights and clearance for trains, it is considered that the design and finish of the proposed bridge be considered in the context of the heritage feature that it is replacing.

It is recommended that the proposed bridge incorporates the material from the existing Railway Terrace bridge into its construction to retain an element of architectural value at the location and to benefit the character and setting of the location.

Response to Issue Raised

Wherever a bridge spans over the railway it is necessary to ensure that the OHLE passes safely below the bridge. The bridges on the approach to Drogheda MacBride Station, namely the masonry arch bridges OBB80, OBB80A and OBB80B which carry McGrath's Lane over the railway line do not provide the necessary clearance for OHLE. A range of options to reduce impacts have been considered. The options include modifications to the track layout and structural solutions to gain the necessary vertical and horizontal clearance. The options considered include the following (either standalone or in combination):

- Provision of specialist electrical solutions for the OHLE with reduced clearance;
- Lowering the rail track under the bridge;
- Modification of the existing bridge structure;
- Removal of the existing structure and provision of a replacement structure.

In selecting the Preferred Option proposed for OBB80/OBB80A/OBB80B, the Applicant followed the process set out in Chapter 3 Alternatives of the EIAR, as detailed in Section 3.5.1.4 in particular

The Applicant would also like to highlight the Option Selection Report Volume 1 (this is also included as Appendix A3.4 in Volume 4 of the EIAR). This describes in detail the options considered and assessed as well as the rationale for the decisions made. Further detail on the option selection process that OBB80/80A/80B went through is also described in the Option Selection Report (Volume 2: Technical Report Section 4) and is detailed in Annex 3.2 E Section 5. These were published and presented during the second round of public consultations held between 09th May 2023 and 23rd June 2023. The Option Selection Report (Volume 1 and 2) and Annexes are included as part of the response and can also be viewed on dart-coastal-north-public-consultation-no-2-useful-material-and-downloads.

As explained in Annex 3.2E5, OBB80/80A/80B the existing vertical clearance beneath these structures is insufficient to accommodate electrical wiring without some form of physical intervention (to either the track below or the bridge itself). Three options were shortlisted and

following the Multi-Criteria Assessment, Option 1 (new bridge in existing location) was identified as the preferred option.

Consultation with the Louth County Council (LCC) Heritage Office was also undertaken during the design development stage. Brendan McSharry of LCC Heritage Office confirmed that none of the structures presented in LCC are listed as protected and noted that while the interventions should be considerate, they should not prevent the installation of a well-designed solution which provides for the infrastructure necessary for the Project and should encourage active means of travel.

Chapter 21 Architectural Heritage of the EIAR, has assessed the potential effects on Architectural Heritage arising from the proposal to remove and replace OBB80/80A/80B during both the Construction and Operational Phases.

OBB80/80A/80B are of architectural heritage interest as they are noted on historic maps. The removal and replacement of OBB80/80A/80B, as visually demonstrated in photomontage viewpoint D1 (Figure: 15.3.55.2 in EIAR Vol 3B (Photomontages), is as explained above required to facilitate sufficient overhead clearance for the extended OHLE to Drogheda. They are of medium sensitivity. The magnitude of the impact of their removal and replacement is high. The residual Construction Phase impact is Direct, Negative, Significant, Long term (EIAR Chapter 21 Table 21-13).

The proposed removal of OBB80/80A/80B Newtown Bridges McGrath's Lane will have a negative visual impact on Drogheda MacBride Station (BH-146), the magnitude of which is low. The potential Operational Phase impact is Indirect, Negative, Slight, Long term.

8. Summary of Issue Raised

The submission notes that Mr. Dunne is concerned that the proposed Railway Order and the prolonged extent of the construction period will have a detrimental impact upon the value of his property at Newtown Lodge. It is reasonable to expect that the value that could be sought for the property prior to any grant of permission by An Bord Pleanála in respect of the proposals would be significantly greater in comparison to that value during the c. 3-year construction period of the development and beyond, subject to programme slippage.

The submission notes that the landowner reserves the right to seek compensation in the event of any depreciation in value of his property as a result of the Proposed Development.

Response to Issue Raised

If the Railway Order is granted compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. A property owner may be entitled to make a claim in respect of the acquisition under various headings. More information on CPOs

and compensation is available from the website of the Society of Chartered Surveyors Ireland website: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

A chartered valuation surveyor experienced in the area of compulsory purchase will be able to assess the compensation payable to those affected by CPO. They will take a number of factors into consideration and be able to negotiate on behalf of affected property / landowners, in order to obtain their full entitlement to compensation.

5.5.5 SB0134 – Ravalá Limited

Representative: Ray Ryan (BMA Planning)

Submission Location – Drogheda

1. Summary of Issue Raised

The submission notes that the proposed land acquisitions for embankments, substations, and temporary compounds would result in the loss of valuable land zoned for high-density development adjacent to Drogheda MacBride Station.

The proposed substation location involves permanent acquisition of prime land, which the submission argues is unsustainable and contrary to planning objectives, requesting relocation to more suitable lands.

Response to Issue Raised

One of the main objectives of the DART+ Coastal North Project is to deliver a higher frequency, higher capacity electrified rail service between Drogheda and Dublin City Centre and to support the rapid transition required to deliver on a low carbon climate resilient transport system. As such it is an infrastructure project of national importance.

The Project aligns with and is indeed referenced within relevant national, regional and local policy documents as detailed in Chapter 2 Policy Context of the EIAR. In particular, in respect of the points noted in the submission, the Louth County Development Plan 2021 – 2027 recognises that the “DART Expansion Programme” is an important growth enabler for Drogheda as it would improve the connectivity to Dublin due to the increased frequency of services, making the town more accessible and attractive for economic investment and employment generating development.

In respect of zoning, it is noted that the lands in question are within lands zoned as J1 – Transportation Development Hub in the current Louth County Development Plan 2021 – 2027. This zoning objective includes several types of development aimed at enhancing connectivity and promoting sustainable urban growth.

The Proposed Development focusses on enabling an increased modal shift to public transport through the extension of the DART to Drogheda and the increase in capacity and frequency of the service. In so doing, it also better facilitates transit oriented developments in the vicinity

of the station, such as those noted in the submission. This development is therefore considered to be in accordance with the zoning objective as set out in the Development Plan.

2. Summary of Issue Raised

The submission notes that the reconstruction of McGrath's Lane Overbridge would unnecessarily acquire prime urban land, and the proposed embankments could be replaced with retaining walls to reduce the land impact. Extract below showing Murphys alternative proposal.

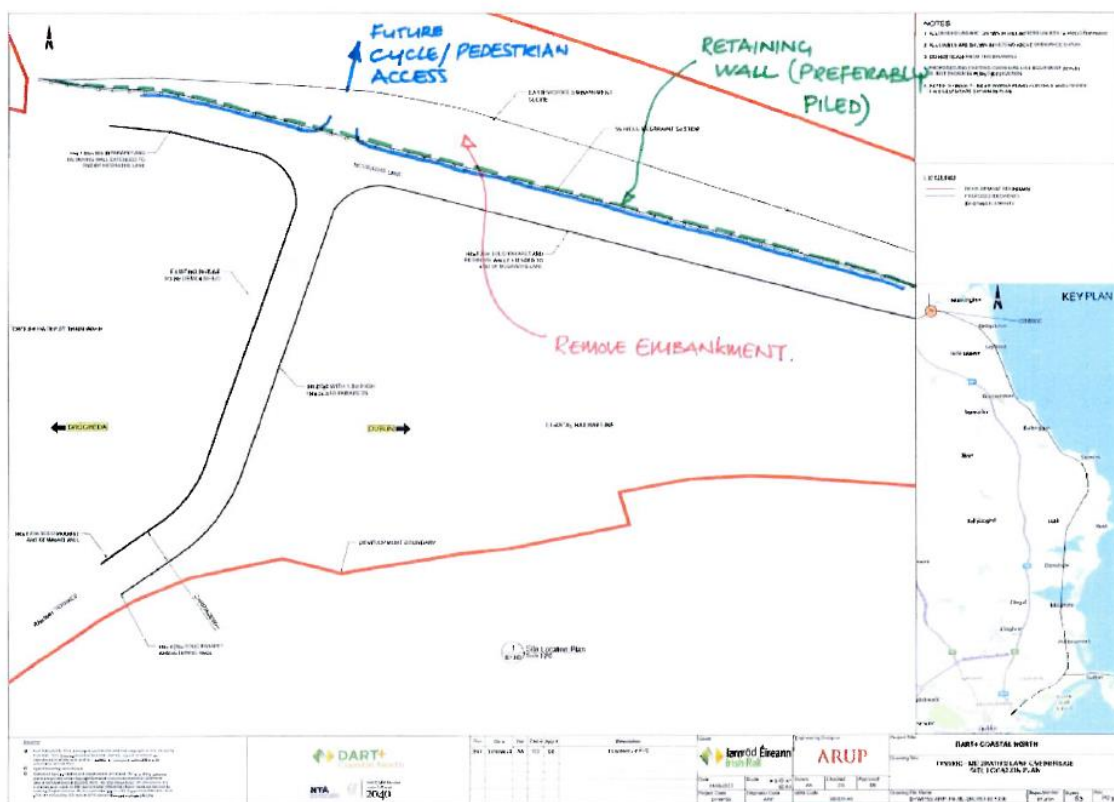


Figure 29 - Alternative Bridge Reconstruction Proposal from Submission SB0134

Response to Issue Raised

The design has been developed to adopt a sustainable and cost-effective solution. This meant that, in this location, earthwork embankments were selected as the most appropriate solution. The earthworks solution is a more economical solution for the Project (reduced capital cost), a more sustainable solution (reduced carbon footprint) and an enhanced solution from a biodiversity perspective (we are retaining the existing hedgerow).

3. Summary of Issue Raised

The submission notes that the proposed location of the temporary construction compounds sterilises a large portion of the clients' lands, delaying planned development. Alternative, un-zoned lands are suggested for these purposes.

The submission also notes that the extent of the temporary land take sought appears excessive and it is irregular in shape leaving the entirety of the subject lands either sterilised or effectively sterilised for the period of the construction of the DART+ Coastal North Project which will remove the landowner's ability to develop the lands.



Figure 30 - Extract from SB0134 showing purported Sterilised / Effectively Sterilised Lands

The submission notes for example, that there are other suitable lands in the area, including un-zoned lands owned by Louth County Council to the east of the Newtown Access Road and west and south of the Drogheda Wastewater treatment Plant, which are convenient for the DART+ project – see lands identified as "1" on Fig above. Other potential locations include the undeveloped industrial lands to the north off Marsh Road and the Pitch and Putt course. There are also large, underutilised areas within the CIE lands around MacBride Station which could reduce the extent of the compounds required. There is no indication that the alternative options have been adequately assessed

Response to Issue Raised

The Applicant fully understands the concerns raised in the submission by the prospective developer of the lands in question. The Applicant does however note that, it would appear, at the current time, that no planning permission exists for any development within these lands.

Notwithstanding, consultation has been undertaken with the landowners with respect to the Proposed Development, to ensure that the Applicant has addressed their concerns to the extent possible prior to the Railway Order application submission.

The Project team has engaged directly with this property owner since it became apparent that lands registered to them would be impacted by the Project boundary. Initially, as part of a wider mail-out to all properties in the Project area, a leaflet was distributed to this property at the start of the Public Consultation No.1 (PC1) in Q3 2022. A letter and leaflet were sent to the landowner following identification of substation locations as part of PC2 documentation in Q2 2023, notifying them that their property was within the extents of the Project boundary. Prior to this notification there had been consultation with the landowner in relation to permission to carry out environmental surveys on his lands.

A summary of key communications is presented below to demonstrate the efforts to engage with the landowner:

- 2023-04-25: Initial landowner engagement meeting to discuss the proposals presented in PC2 and provide clarification to queries raised.
- 2023-07-20: Follow up meeting to discuss iterations to the design and extents of landtake further to the initial meeting and email correspondences.
- 2023-10-24: Follow up meeting to discuss iterations to the design and extents of landtake further to the previous meeting and email correspondences with a view to addressing landowner concerns and reaching approval in principle for the DART+ Coastal North proposals.

Further to the above, additional email correspondences and a number of design iterations, such as those described in Chapter 3 Alternatives of the EIAR (see Chapter 3 section 3.6.2), have helped move the consultation along to a point where approval in principle had, in the Applicants view, been reached with the landowner. Some email and telephone correspondences in relation to survey access requests have also taken place during the design development.

In developing our design, the temporary land take was identified with consideration for the space required to reconstruct the McGraths Lane bridge, construct the new Drogheda substation and support the line-wide works around Drogheda and on down the line towards Laytown. The area identified is that which is considered reasonable so as to not unduly limit the contractor's ability to deliver the works.

Prior to the initial consultation with the landowner the construction compound was located adjacent to the railway corridor, however following feedback from the developer the main compound was moved to the north of the field to allow for the developer's proposed first stage of development (again noting this does not have planning permission).

If the developer's proposals have changed, the Applicant remains willing to work with them to come to an arrangement that works for all.

In respect of the alternative sites suggested, the Applicant notes as follows:

- 1) Locating a compound to the east of the Newtown Access Road would involve construction plant regularly crossing the public road, creating a safety risk.
- 2) Locating a compound north of Marsh Road would involve construction plant regularly crossing an even busier public road, creating a bigger safety risk.
- 3) Locating a compound on the pitch and putt course would remove a public amenity.

Please refer to EIAR Volume 2: Chapter 5 Construction Strategy, Section 5.8 for further detail on the construction plans for the Drogheda area.

4. Summary of Issue Raised

The submission notes that the Environmental Impact Assessment Report (EIAR) lacks sufficient evaluation of alternatives for the substation, embankments, and construction compounds, failing to consider impacts on high-density urban development.

Furthermore, the observer notes that the landowner considers that the justification and rationale for the permanent acquisition to accommodate the ESB Substation is inadequate and does not support the acquisition of our clients' lands as part of the Railway Order.

Response to Issue Raised

The Applicant notes that the Proposed Development provides for the electrification and re-signalling of the existing railway. To provide electrical power to the trains, overhead line equipment (OHLE) and electrical substations will be needed. Findings from a traction power study indicated that eight new substations are required between Malahide and Drogheda to provide power to the electrified network.

Chapter 3 Alternatives of the EIAR (see Section 3.3 in particular) provides an overview of the alternatives considered and describes in detail the process followed. Section 3.4 of the EIAR describes the stakeholder engagement and consultation undertaken during the design process. This section also references the key documentation published during the non-statutory consultations and the Applicant would like to highlight in particular the Option Selection Report Volume 1 that can be found on the www.dartplus.ie webpage (this is also included as Appendix A3.4 in Volume 4 of the EIAR). This describes in detail the options considered and assessed as well as the rationale for the decisions made.

As outlined in Chapter 3 of EIAR, Section 3.5.2, the siting of each substation within any general area has considered the following:

- The land-use and development context of potential locations;

- The substations will be located adjacent to the railway line in the form of a fenced compound surrounding a single storey building which will house all the necessary electrical switching and feeding equipment;
- The substations will be connected to the local power distribution network and the OHLE system using insulated cables. These cables will be installed in buried routes for additional protection;
- The substations will need to be accessible from the local road network for construction and maintenance purposes; and
- The footprint of each substation compound and requirement for the building to house the electrical equipment for both IÉ and ESB.

While every effort has been made to contain the necessary works within existing IÉ owned lands, this has not always been possible. Where works are required outside of IÉ lands, lands required for Construction Compounds will typically be on a temporary basis while the lands required for the substations will be on a permanent acquisition basis.

The outputs of the power study indicated that the study area for a substation at Drogheda extended from the end of McGrath's Lane to the Marsh Road Pay & Display car park. Nine options were considered within this study area with six options taken forward to the detailed multi-criteria assessment (MCA). The Preferred Option which is the subject of this RO application was identified as such based on economy, environment, and integration criteria. The Option Selection Report Volume 2 Technical Report presents the detail of the option selection process which has led to the choice of the Preferred Option. This was published as part of the second non-statutory public consultation and is referenced in the EIAR - Appendix A3.4 (Options Selection Report Volume 1 - Preferred Options Report).

The Applicant acknowledges the concerns of J Murphy Construction Limited / Ravala Limited (MCL / RL), and points towards a period of extensive consultation with MCL / RL carried out during the Project development as detailed above, where numerous iterations of the Project design were developed further to feedback with a view to minimising potential impacts on MCL / RL lands and their future plans.

5. Summary of Issue Raised

The submission notes that the form and design of the substation compound is incompatible with the future development of the western portion of the lands for high density urban development adjacent to a railway station. In addition to the lands to be acquired, there is a very significant impact on the retained lands as a result of the retaining walls c.3.5 meters above the existing ground level which will very severely impact on the type and extent of development permissible at this location when compared to the "no scheme world".

The submission further contends that the footprint and the associated land take of the substation compound is excessive.

Response to Issue Raised

The substation compound is a fundamental element of this Project, as it is required to ensure the reliable delivery of the increased energy capacity necessary to support the electrification of the DART+ network. This infrastructure is critical to realising the transport-oriented development goals for the area and accommodating the anticipated population and economic growth.

While the compound occupies part of the lands, the retained lands will still support high-density urban development. The substation's proximity to the railway station ensures alignment with the area's strategic vision of integrated transport and urban planning. Without this infrastructure, the area's potential for development in a sustainable and efficient manner would be significantly constrained.

The retaining walls, with a height of approximately 3.5 metres above the existing ground level, are a necessary engineering solution dictated by site-specific conditions required to achieve electrification clearance under OBB80C. It is unclear how the retaining walls may impact the retained lands as they are provided on the railway side of McGrath's Lane, and along Railway Terrace to avoid impacting on local resident's rear gardens. Therefore, their presence does not preclude high-quality development to the lands to the north. The DART+ Coastal North Project team is committed to implementing mitigation measures such as landscaping and design features to minimise the visual and functional impact of the retaining walls and integrate them into the urban environment.

The footprint of the substation compound has been carefully considered to minimise the necessary land take while having the ability to meet the current and future energy needs of the DART+ Coastal North network. The scale of the compound reflects the anticipated increase in energy demand arising from the electrification of the railway it will enable. Reducing the footprint could compromise the substation's ability to deliver the required capacity, which would undermine the long-term viability and effectiveness of the DART+ Coastal North Project. Every effort has been made to minimise impacts on the retained lands while ensuring the Project delivers the infrastructure necessary to support sustainable growth.

The "no scheme world" scenario proposed in your submission does not account for the fundamental need for the DART+ Coastal North infrastructure to unlock the area's development potential. Without this critical infrastructure, high-density development adjacent to the railway station would face severe limitations due to insufficient sustainable transport options. The substation is not an obstacle to future development but rather a key enabler of it, facilitating sustainable urban intensification and connectivity.

It is important to reiterate the wider benefits of the DART+ Coastal North Project. By electrifying and enhancing the railway network, the Project will reduce reliance on private car travel, lower carbon emissions, and significantly improve connectivity for communities along the corridor. The substation compound is an indispensable component of this broader vision, and its design has been optimised to balance functionality with land use considerations.

6. Summary of Issue Raised

The submission calls for enhanced pedestrian and cycling connections to Drogheda MacBride Station, particularly through an upgraded footbridge that integrates better with future development plans.

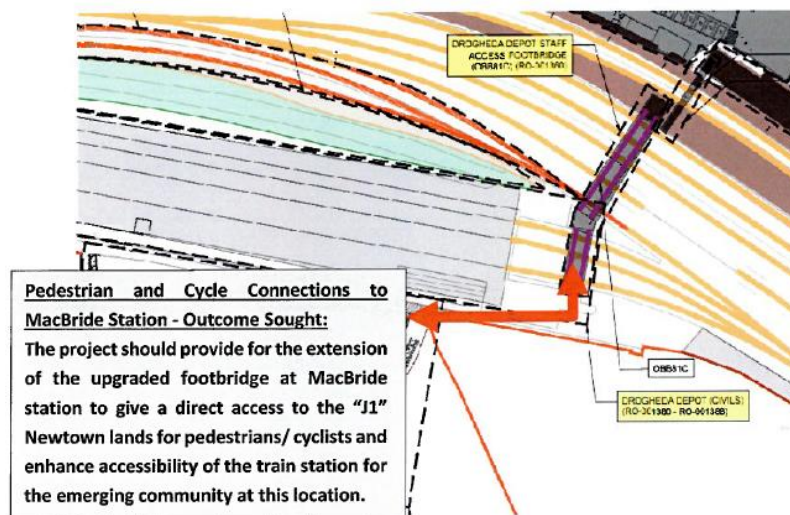


Fig 8: Suggested Provisions for Future Pedestrian/ Cycle Link to MacBride Station

Figure 31 - Excerpt from Submission 0134: Suggested Provisions for Future Pedestrian / Cycle Link to MacBride Station

Response to Issue Raised

The upgrade works proposed to OBB80/80A/80B aim to establish this connection as an active travel priority crossing, with local vehicle access to the two existing landowners along McGrath's Lane. This represents an enhanced connection for pedestrians and cyclists to use the existing connection via Railway Terrace from the Proposed Developments already under construction.

OBB81 is a connection to the Depot facility from the station and is not in use as a public connection. Shared access is not possible due to the risk of members of the public trespassing into the Depot.

6. RESPONSE TO SUBMISSIONS FROM OTHER PARTIES OR THE PUBLIC ON THE PROPOSED SCHEME

6.1 Zone A

There were no submissions received from other parties or the public from Zone A.

6.2 Zone B

A significant number of submissions from other parties or the public were received in respect of works within Zone B, the vast majority of which related to works at Howth Junction & Donaghmede Station and the Howth Branch (future operational changes which are enabled by DART+ Coastal North). These are addressed below. Where these issues are addressed in earlier sections of the report, for brevity, reference has been made to these appropriate sections.

6.2.1 SB0001 – Abbey Park & District Residents Association Baldoyle

Representative: John Oliver McCann

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that Irish Rail is ignoring the 20K or so residents along this branch so as to facilitate the newer users along the northern line.

Response to Issue Raised

The Applicant refutes the claim that commuters on the Howth Branch are being ignored.

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account

2. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the interchange the Howth Junction & Donaghmede station would be of “inconvenience” and would also make getting a seat on the train “near impossible” during peak times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and

- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that the road space available may not be able to cater to the lengthened tailbacks.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Sections 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services.

5. Summary of Issue Raised

The submission claims that there will be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes will require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which will require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional. The submission also mentions the lack of clear signage.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6.2.2 SB0002 – Adéle Sleator

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development “*degrades the public transport in the area and is not consistent with the planning conditions.*” This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

2. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would not be a “reliable adequate service” as it would make getting a seat on the train difficult during peak times, likely requiring travellers to wait a while to get a train to accommodate them.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development’s plans to use Howth Junction and Donaghmede station as an interchange point.

The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional. This change in platforms proposed by the Applicant would delay travellers and would not be suitable for people with special needs. The submission poses the question whether Irish Rail has "properly designed it from a customer perspective?".

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission includes its concern with the use of Howth Junction and Donaghmede as it is exposed to the weather. It raises the fact that the plans for the Proposed Development do not include the provision of shelter improvements for passengers waiting on the middle platform of the station. The submission adds that there is a history of antisocial behaviour and incidents at this station. It claims that the proposal subjects passengers from Howth, Sutton, and Bayside to an increased risk of harm.

Response to Issue Raised

Section 2.3.1.6 details the proposed upgrades to the Howth Junction & Donaghmede Station which will both improve the passenger experience generally and develop the station to better serve as an interchange station into the future. This includes for example (and addressing specific concerns raised in some of the submissions) the provision of additional shelter on the platforms for those who might be interchanging in the future.

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross.

The submission notes that the likely frustration caused by longer wait times could result in more reckless driving.

Response to Issue Raised

The Applicant acknowledges the ongoing issues with poor driver behaviour as a risk associated with level crossings. Iarnród Éireann continue to work with an Garda Síochána, Local Authorities and the NTA to raise awareness of the dangers of level crossings with a view to reducing the safety issues associated with closing level crossings.

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times leading to greater air pollution from idling engines.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

7. Summary of Issue Raised

The submission questions the accuracy of the traffic assessment as it claims the assumption that the same volume of car traffic, that currently arrives at the level crossings, would continue to arrive in future is flawed. The submission claims that the inconvenience of the increased level crossing closures will increase the number of people choosing to drive over taking the DART due to the DART no longer being reliable. This shift of current DART users to car users will increase the volume of traffic on the roads, a factor which wasn't anticipated in the traffic assessment.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

8. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use (golf course users). In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

9. Summary of Issue Raised

The submissions claims that the Proposed Development would benefit from improvements in signalling to reduce road closures in the Howth/ Sutton areas.

Response to Issue Raised

Refer to Section 2.3.1.4 - Improvements/ Optimisation of Level Crossings.

6.2.3 SB0003 – Alan and Siobhan Brown

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre. It claims that the Proposed Development would degrade the public transport in the area and is in opposition to national transport and climate policy of reducing car dependency. This will have major implications on tourism to the Howth peninsula.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.11 - Impact on Tourism.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission also claims that the road space available may not be able to cater to the lengthened tailbacks.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change, which would require different platforms, would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses as they may experience delays in deliveries etc.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission includes a request for an Oral Hearing to discuss the Project further and address community concerns.

Response to Issue Raised

Refer to Section 2.2.2 – Request for Oral Hearing.

6.2.4 SB0005 – Ann and Oliver Keegan

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would be “inconvenient” and expose travelers to poor weather conditions as is expected at Howth Junction & Donaghmede station.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

2. Summary of Issue Raised

The submission claims that the Proposed Development would worsen the traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6.2.5 SB0006 – Ann Scully

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users (commuters, students, tourists) along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would cause journey times to be “significantly longer” and it would make getting a seat on the train

difficult during peak times, likely requiring travelers to wait a while to get a train to accommodate them.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission claims that the Proposed Development would be a downgrade to the existing service. It highlights the future increase in population on the Howth peninsula and that this increase in population, potential DART users, will coincide with "the downgrading of the DART system".

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that the proposed refurbishments to the station, such as cameras and lighting, will not be sufficient to address their concern.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission says this will likely cause a disruption to the bus service.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6.2.6 SB0007 – Ann McCarthy, Owen McCarthy, Emer McCarthy, Conor McCarthy, Riona McCarthy

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concern over the apparent downgrade in DART service as the Proposed Development in a time where there is significant population growth in Howth, increasing the need for an appropriate public transport system.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

2. Summary of Issue Raised

The submission pleads with the Applicant to maintain the existing direct DART line to Howth “as a matter of priority”.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission claims that the Proposed Development would worsen the traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

5. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre or local businesses and commuters. It wonders if the negative impact the Proposed Development would have on businesses and travel times has been considered. The submission claims that the degradation of the DART service would be in opposition to the National Sustainable Mobility Policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

6. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 – Request for Oral Hearing.

6.2.7 SB0008 – Anthony Davey, Isobel Murray

Representative: n/a

Submission Location – Howth (Relevant to Howth Lodge & Howth Branch)

1. Summary of Issue Raised

The submission claims that since the establishment of the DART, the Claremont level crossing has been closed more frequently and for longer periods, causing significant inconvenience for residents on Claremont Road. It notes that the proposed increased closure of the Claremont level crossing would further restrict this right of way and breach residents' right to enjoy their homes, which will inevitably be subject to legal challenge.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.2.2 - Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877.

2. Summary of Issue Raised

The submission claims that the restricted/reduced level of access across Claremont Level Crossing is a particular concern when considering emergency services. It notes that these closures make it difficult to respond quickly in emergency cases, which significantly increases health and safety risks.

Response to Issue Raised

Refer to Section 2.3.2.3 - Emergency Services.

3. Summary of Issue Raised

The submission raises concerns about the reduced access across the level crossing, which increases the potential for queuing on Howth Road for vehicles entering Claremont Crossing. It emphasises that the area between the level crossing and Howth Road can only hold 2-3 vehicles at a time, and the main road has only one lane in each direction, exacerbating the congestion issue. It notes that the traffic backup would make the corner on Howth Road a black spot for cyclists, posing a high risk, especially during periods of darkness.

Response to Issue Raised

Refer to Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road.

4. Summary of Issue Raised

The submission claims that the Projected population growth in Howth will significantly exacerbate the traffic situation in the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

5. Summary of Issue Raised

The submission raises concerns about the apparent use of the manual override of the “approaching train movement Track Control Circuit,” which is causing extended barrier closures at Claremont Level Crossing. It requests that this situation be investigated and reported on, with relevant surveys conducted to address the issue of appropriate closure durations and road traffic times.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic

6. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development’s plans to use Howth Junction station as an interchange point. The need to change the train will pose significant difficulties for older and younger passengers, making the journey inaccessible for certain groups of passengers.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

7. Summary of Issue Raised

The submission adds that there is a history of vandalism, anti-social behavior and incidents at this station. It claims that the proposal will subject passengers from Howth, Sutton, and Bayside to an increased risk of harm. The lack of security official at this station makes it unsafe to all passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6.2.8 SB0010 – Cllr. Aoibhinn Tormey

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission welcomes the expansion of the DART line however raises concern over the loss of the direct DART Service to Howth and how it will negatively affect residents, tourists, visitors and businesses.

Response to Issue Raised

The Applicant acknowledges and notes appreciation for the welcoming of the DART+ Coastal North Project.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

2. Summary of Issue Raised

The submission claims that the Proposed Development would worsen the traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission notes concern over not receiving, upon request, additional information on the proposed shuttle service from Irish Rail and that Irish Rail's most recent failings with timetable changes in August 2024 increases their concern with the proposed changes.

Response to Issue Raised

The Applicant would like to clarify that through the two non-statutory public consultations, and the statutory consultation, it has been regularly stated that the DART+ Coastal North Project is a project tasked with the provision of infrastructure to enable the proposed increases in train frequency and capacity to meet the requirements of TSS1C. To meet the maximum level of service requirements it will be necessary to operate a shuttle service on the Howth Branch. Any future changes to timetables, which may lead to the operation of a shuttle service on the Howth Branch, will be based on future demand requirements. This has been stated clearly in all public consultation and published documents.

Refer to:

- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity and
- Section 2.2.20 - Issues with previous timetable changes.

5. Summary of Issue Raised

The submission considers the shuttle service “unnecessary” considering Irish Rail's recent announcement to expand the number of rail tracks on the Northern route out of Dublin.

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning
- Section 2.3.1.16 - Need to look at alternatives .

6. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.9 SB0012 Audrey and Paul Farrelly, Consila and Jonny O'Leary, Alison and Paul McGuinness, Ingrid and Dom Nolan, Paul and Tracey Ialey

Representative: n/a

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concern with the potential devaluing of their property that could be a result of the loss of the direct DART service.

Response to Issue Raised

Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

2. Summary of Issue Raised

The submission claims that population growth in the area will cause an increase in the number of cars on the roads causing gridlocks should there be a deterioration in the DART service.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional. The submission also claims that seats may not be available on busy trains.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station

5. Summary of Issue Raised

The submission raises concerns about security and anti-social behaviour at Howth Junction & Donaghmede Station.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6.2.10 SB0014 – Baldoyle Active Retirement Association

Representative: Robert Farrell

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about the loss of direct DART service and how it would affect lives of residents in the affected areas.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that an increase in the time the level crossing barriers are closed will negatively impact road commuters in addition to emergency services and pedestrians.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission emphasises that it will pose difficulties for people with disabilities, especially if lifts being out of order.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission adds that there is a history of anti-social behavior at Howth Junction. It claims that the proposal will subject travelling passengers to an increased risk of harm.

Response to Issue Raised

Refer to 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises concerns about overcrowding at Howth Junction, particularly at peak times. It suggests it will pose difficulties and make travel uncomfortable for most passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station

6.2.11 SB0015 – Baldoye Library Bookies Book Group

Representative: Lee Hogan Kerrigan

Submission Location – Baldoye (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development will have an impact on tourism. It will also make public transport less accessible for some residents.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.15 - Concern around increased population in Howth,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that an increase in the time the level crossing barriers are closed will negatively impact road commuters.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission raises concerns about the impact of increased road traffic. It suggests that if An Bord Pleanála (ABP) grants permission for the proposal, Irish Rail should take responsibility for gathering, organizing, and managing assessments from all emergency services and Dublin Bus services regarding the proposal.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals,
- Section 2.3.1.7 - Impact on Emergency services and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission requests that Irish Rail specify the minimum number of services in each direction that it plans to provide for users in Howth, Baldoyle, Sutton, and Bayside. It also suggests that Irish Rail include a minimum number of direct services to and from Howth during both peak and off-peak times.

Response to Issue Raised

The Applicant is not able to specify any minimum number of services, or frequencies, as these have yet to be determined and will be linked to future demand and the development of future timetables.

Refer to Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated - The people of Howth require clarity.

5. Summary of Issue Raised

The submission raises concerns about the safety of students commuting to school. It requests that Irish Rail either provide a direct service or, at the very least, improve conditions for safety of young people at this location.

Response to Issue Raised

Refer to:

- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction as an interchange point. It suggests the Proposed Development will make travel less accessible.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

7. Summary of Issue Raised

The submission claims that the Proposed Development will discourage people from using the DART, leading them to revert to using their cars. This would contradict the recommendations made in the OECD and the Irish Climate Change Advisory Council report to redesign Ireland's transport system for Net Zero.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

8. Summary of Issue Raised

The submission requests for Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.12 SB0016 – Barry and Jean Crowley

Representative: n/a

Submission Location – Howth (Relevant to Howth Lodge & Howth Branch)

1. Summary of Issue Raised

The submission highlights the error of using "private road" instead of "public road" in the Phase One Consultation documentation for Claremont Crossing (913).

Response to Issue Raised

The Applicant acknowledges that an error was made in Public Consultation Documentation in relation to the status of Claremont Road. The Applicant does note that in Appendix A6.1 this road was noted as a private road, but it is acknowledged that this is a public road which provides access to 8 private residences.

2. Summary of Issue Raised

The submission argues that the times presented by Irish Rail for barrier closures at four level crossings do not reflect reality. It notes that the actual closure times average 3 to 3.5 minutes.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access.

3. Summary of Issue Raised

The submission raises concerns about the reduced access across the level crossing, which increases the potential for queuing on Howth Road for vehicles entering Claremont Crossing. It emphasises that the queue would block the traffic flow in both directions.

Response to Issue Raised

Refer to Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road.

4. Summary of Issue Raised

The submission claims that Irish Rail did not consider the projected population growth in Howth, which will significantly exacerbate the area's traffic situation. It also notes that traffic volumes already increase significantly on weekends, causing “bumper-to-bumper tailbacks” between Howth, Sutton, Baldoyle, the Howth Road Junction, and beyond.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

5. Summary of Issue Raised

The submission claims that Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877. It notes that the proposed increased closure of Claremont level crossing would effectively reduce and limit this right of way and inevitably be subject to legal challenge.

Response to Issue Raised

Refer to Section 2.3.2.2 - Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877.

6. Summary of Issue Raised

The submission raises concerns over safety and accessibility issues at the station. It notes that Howth Junction has no escalators, a poor serviceability record for the lifts and no public facilities.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

7. Summary of Issue Raised

The submissions claims that Irish Rail documentation contains several statements, which were found to be “misleading”.

A number of examples are quoted in the submission.

Response to Issue Raised

The Applicant would like to stress that at no point was there any intention to be misleading in the information provided in the RO Application or any preceding publications.

Throughout the Project development, and the statutory public consultation phase, the Project Team was available and active in assisting people via the Project phone line and email service. This included property owners who sought assistance in reading their property pack during the statutory consultation period.

More generally in relation to communications, Iarnród Éireann has worked hard to communicate widely and clearly with the general public, as described in the PC 1 report, PC 2 Report and PC 2 Addendum Report submitted with the application. Where queries have arisen, the Project team has sought to provide clarification where possible.

8. Summary of Issue Raised

The submission raises concerns over seat availability and inconvenience to passengers when changing trains at Howth Junction. The submission also notes that there would be an exposure to the prevailing weather conditions at the station that can create additional challenges for elderly, infirm passengers or anyone traveling with small children.

Response to Issue Raised

Refer to:

- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

9. Summary of Issue Raised

The submission argues that no research has been completed into the impact of Proposed Development on local businesses and tourism industry.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

10. Summary of Issue Raised

The submission argues that no research has been completed into the impact of Proposed Development on road traffic patterns to/from Howth and the road safety aspects arising from the forced changes in road traffic patterns.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

11. Summary of Issue Raised

The submission claims that the proposed changes will result in downgrade of services between Howth and Dublin.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

12. Summary of Issue Raised

The submission raises concerns over the lack of consideration of alternative solutions like additional track capacity along the Dublin and Drogheda route.

Response to Issue Raised

Refer to Section 2.3.1.16 - Need to look at alternatives .

6.2.13 SB0017 – Bayside Community Association

Representative: Kristina Comiskey

Submission Location – Bayside (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about the loss of direct DART service and how it would affect the lives of residents.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that an increase in the time the level crossing barriers are closed will negatively impact road commuters.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission claims the Proposed Development is not aligning with sustainable travel objectives.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction as an interchange point. It suggests the Proposed Development will make travel less accessible.

Response to Issue Raised

Refer to 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns about the impact of the proposed plan on local businesses and tourism. It emphasises that it will result in delivery delays and a decrease in tourism figures.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism

6. Summary of Issue Raised

The submission requests Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.14 SB0019 – Brendan Clifford, Siobhan Clifford, Christine Moore

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services. These negative effects will be felt by the residents of Claremont Apartments as access to their homes will be worsened by the congestion.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic, Impact on Level Crossings/ Increased wait times/Increased Traffic,

- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures,
- Section 2.3.1.7 - Impact on Emergency services and
- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue could affect the wider road network including buses and cars that aren't passing through the level crossings.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic, Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre. It claims that the Proposed Development would not encourage people to use the DART over their cars. This degradation, the submission claims, would be in opposition to National sustainable transport policies to reduce car dependency and would not align with national transport and climate policies.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change, which would require different platforms, would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission states that there is a history of antisocial behaviour and incidents at the Howth Junction & Donaghmede station. It claims that the proposal will subject passengers from Howth, Sutton, and Bayside to an increased risk of harm. The submission adds that Irish Rail would have to employ 1 staff present in the office and 2 security guards on each platform to make the proposed changes viable.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

7. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses as they deal with delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

8. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.15 SB0020 – Bryan Byrne, Sarah Reilly

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. The submission notes that the likely frustration caused by longer wait times could result in more reckless driving.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission raises their concern that there is a history of antisocial behavior and incidents at Howth Junction & Donaghmede station. It claims that the proposal subjects passengers from Howth peninsula to an increased risk of harm.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

The Applicant acknowledges the ongoing issues with poor driver behaviour as a risk associated with level crossings. Iarnród Éireann continue to work with an Garda Síochána, Local Authorities and the NTA to raise awareness of the dangers of level crossings with a view to reducing the safety issues associated with closing level crossings.

3. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre for commuters. It claims that the Proposed Development “would reduce the convenience and safety of commuting.” This would reduce the appeal of using the DART which may lead to more people opting to drive, contributing to traffic and environmental issues.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would be an “inconvenience” and would also make getting a seat on the train “near impossible” during peak times.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

6.2.16 SB0021 – Lisa Evans, Derek and Marjorie Keating, Geraldine Colfer, Gabriel and Pauline Pollard, John Spain.

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development “degrades the public transport in the area and is not consistent with the planning conditions.” This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development’s plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail’s history with out of order lifts, this change, which would require different platforms, would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this is a safety concern for people with children.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that the road space available may not be able to cater to the lengthened tailbacks.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change,

which would require different platforms, would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

7. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

8. Summary of Issue Raised

The submission claims that the Proposed Development would deter people from using the DART, driving them into their private cars leading to more traffic and more air pollution, affecting the environment.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

9. Summary of Issue Raised

The submission claims that the expansion plan is at the expense of people in Howth and is unfair and unjust.

Response to Issue Raised

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account

10. Summary of Issue Raised

The submission queries the reliability of seats on trains at Howth Junction taking into consideration new building and increased populations on the route.

Response to Issue Raised

Refer to:

- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

6.2.17 SB0024 – St. Mary's Parish, Howth, Parishioners

Representative: Carolyn O'Laoire

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would make people choose to drive their cars rather than take a shuttle service. This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this will raise the level of anxiety while commuting.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users (buses and cars) commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services.

6. Summary of Issue Raised

The submission claims that the Proposed Development would lead to longer journey times for school goers and commuters.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures

7. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.11 - Impact on Tourism.

8. Summary of Issue Raised

The submission highlights the growing population in the area is related to the direct line giving easy access to Dublin City Centre. The Proposed Development, to remove the direct line, would negatively affect the growing population of commuters.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

6.2.18 SB0025 – Catherine & David Tattersall

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times leading to greater air pollution from idling engines.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that it would result in bus delays, pushing commuters into their cars.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission questions the accuracy of the traffic assessment as it claims the assumption that the same volume of car traffic that currently arrives at the level crossings would continue to arrive in future is flawed. The submission claims that the inconvenience of the increased level crossing closures will increase the number of people choosing to drive over taking the DART due to the DART no longer being reliable. This shift of current DART users to car users will increase the volume of traffic on the roads, a factor which wasn't anticipated in the traffic assessment.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises their concern with the effect the loss of the direct DART service to Howth will have on the value of their homes and whether the government will compensate the owners of these homes for the devaluation of their properties.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>.

6. Summary of Issue Raised

The submission includes a request for an Oral Hearing to be held.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.19 SB0026 – Catherine McCann, Roisin Sloane, Christine Greenan, Lauretta McGee, Jodie McDonnagh.

Representative: n/a

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would be of “inconvenience” and reduce the efficiency of commuting.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Station Road. The submission notes that the delays may lead to increased frustration.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

The Applicant acknowledges the ongoing issues with poor driver behaviour as a risk associated with level crossings. Iarnród Éireann continue to work with an Garda Síochána, Local Authorities and the NTA to raise awareness of the dangers of level crossings with a view to reducing the safety issues associated with closing level crossings.

3. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services.

4. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would be “not as straightforward” and would also make getting a seat on the train near impossible during peak times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail. This safety concern could lead to people choosing to drive over getting the DART, contributing to air pollution.

Response to Issue Raised

Refer to:

- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

6. Summary of Issue Raised

The submission claims that Howth Junction and Donaghmede station is “not fit for purpose” as an interchange point despite the plans to upgrade the station. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail’s history with out of order lifts, this change which would require different

platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

7. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses and the tourism industry. In the submission it claims that the disruption to the DART line could deter tourists and reduce footfall to the Howth peninsula.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

8. Summary of Issue Raised

The submission claims that the proposed shuttle will have an effect on the market value of property in the area.

Response to Issue Raised

Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

6.2.20 SB0027 – Christopher Elsom

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

The Applicant acknowledges the ongoing issues with poor driver behaviour as a risk associated with level crossings. Iarnród Éireann continue to work with an Garda Síochána, Local Authorities and the NTA to raise awareness of the dangers of level crossings with a view to reducing the safety issues associated with closing level crossings.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle

train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.21 SB0028 – Minister Cian O’Callaghan T.D.

Representative: n/a

Submission Location – Dublin (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected, particularly given the level of growth in population in these areas.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction, Lauder's Lane, Howth Lodge and Sutton Cross. The submission notes this will negatively affect all road users.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission questions the accuracy of the traffic assessment as it claims the assumption that the same volume of car traffic that currently arrives at the level crossings would continue to arrive in future is flawed. The submission claims that the inconvenience of the increased level crossing closures will increase the number of people choosing to drive over taking the DART due to the DART no longer being reliable. This shift of current DART users to car users will increase the volume of traffic on the roads, a factor which wasn't anticipated in the traffic assessment. The Proposed Development, the submission claims, would be in opposition to government policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission claims that Irish Rail has recently announced their plans for additional tracks to be made between Malahide and Connolly station. The submission wonders whether this proposal negates the rationale behind the removal of the direct DART service.

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

6. Summary of Issue Raised

The submission expresses disappointment that the documentation was not made available in hard copy in either the Baldoyle or Howth libraries.

Response to Issue Raised

In accordance with the Statutory Processes, hard copies of the Railway Order Application were displayed in the offices of An Bord Pleanála, the relevant Local Authorities, and in relevant Irish Rail locations. These requirements were delivered upon as part of the Application process, and furthermore, additional hard copies were also displayed at a variety of locations along the Project extents to ensure a good spread of locations where members of the general public could view the information.

Hard copies of the DART+ Coastal North Railway Order Application documentation and the Pre-Application Consultation documentation were available at the following 12 locations in counties Dublin, Meath and Louth:

- An Bord Pleanála, 64 Marlborough Street, Dublin 1, D01 V902;
- Planning Department, Dublin City Council, Civic Office, Wood Quay, Dublin 8, D08 RF3F;
- Planning Department, Fingal County Council, County Hall, Main Street, Swords, County Dublin, K67 X8Y2;
- Fingal County Council, Grove Road, Blanchardstown, Dublin 15, D15 W638;
- Planning Department, Meath County Council, Buvinda House, Dublin Road, Navan, County Meath, C15 Y291;

- Planning Department, Louth County Council, County Hall, Millennium Centre, Dundalk, County Louth, A91 KFW6;
- Donaghmede Library, Donaghmede Shopping Centre, Grange Road, Dublin 13, D13 XW28;
- Rush Library, Chapel Green, Rush, County Dublin, K56 ED95;
- Balbriggan Library, Saint George's Square, Balbriggan, County Dublin, K32 TW27;
- Drogheda Library, Stockwell Lane, Moneymore, Drogheda, County Louth, A92 PY20;
- Iarnród Éireann, Connolly Station, Amiens Street, Dublin 1, D01 V6V6; and
- DART+ Coastal North Project Office, CIÉ Inchicore Works, Inchicore Parade, Dublin 8, D08 K6Y3.

All of the Railway Order documentation was, and remains, available to view at <http://www.dartcoastalnorthrailwayorder.ie/>. Hard copies, and digital copies, of the Railway Order Application were also available upon request, subject to fees as set out on the Project website: <https://www.dartplus.ie/getmedia/942ca3dc-5c5f-4461-baba-a5003b6cbca7/D-CN-Print-Costs.pdf>

7. Summary of Issue Raised

The submission notes that lessons need to be learned from the issues with recent timetables introduced by IÉ.

Response to Issue Raised

Refer to Section 2.2.20 - Issues with previous timetable changes.

6.2.22 SB0029 – Clare McKenna, Anne McKenna, Jonathon O'Connor

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that the road space available may not be able to cater to the lengthened tailbacks.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission raises their concern with the Proposed Development increasing journey times and removing the direct DART line, disrupting the daily lives of commuters, students and workers.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submissions claims that provision of services for commuter towns should not be made at the expense of the people of Howth, Sutton and surrounding areas.

Response to Issue Raised

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account

6.2.23 SB0030 – Cllr. Cathal Haughey

Representative: n/a

Submission Location – Swords (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development “would be a downgrade to the current public transport service”.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

2. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would create “issues with capacity” also making the Southbound train “packed”.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development’s plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission also notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoye Road Junction, Lauder's Lane, Howth Lodge and Sutton Cross. The submission notes that the likely frustration caused by the delays could result in more car users. The submission also raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact emergency services due to the delays.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses and the tourism industry. In the submission it claims that the disruption to the DART line could deter tourists, reducing footfall on the Howth peninsula.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission requests that an Oral Hearing takes place.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.24 SB0031 – Cllr. David Healy

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes their strong support to the electrification of the railway to Drogheda. However, it also includes concerns over the proposals to use Howth Junction & Donaghmede station as a forced interchange point as it would not increase the capacity of the line from Howth Junction & Donaghmede station to Connolly Station. The submission claims that “this element of the Project cannot constitute proper planning and sustainable development”.

Response to Issue Raised

The Applicant welcomes the support for the electrification of the railway to Drogheda.

The Applicant further refers to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission requests that significant work on improving the accessibility of stations and their connectivity to other public transport routes be included in the Proposed Development's plans.

Response to Issue Raised

Refer to:

- Section 2.2.8 - Improvement to Station Amenities (accessibility, public realm)
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission includes an objective from the Fingal Development Plan which would ensure all public transport stations/ stops provide cycle parking. In the submission it emphasises the need for this provision in the DART + Coastal North project.

Response to Issue Raised

Refer to:

- Section 2.2.8 - Improvement to Station Amenities (accessibility, public realm)

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6.2.25 SB0032 – Cllr. Deidre Heney

Representative: n/a

Submission Location – Killester (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission urges that Irish Rail reconsider the preferred option for the Proposed Development as the alternative to add 2 extra railway line north of Connolly station would solve the problem of increasing capacity on the line while maintaining the direct DART to Howth.

Response to Issue Raised

Refer to Section 2.3.1.16 - Need to look at alternatives .

2. Summary of Issue Raised

The submission raises their concern that there is a history of antisocial behavior and incidents at Howth Junction & Donaghmede station. It claims that the proposal will subject passengers from Howth, Sutton, and Bayside to an increased risk of harm. The submission queries the security plans to improve the safety for passengers at this station.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6.2.26 SB0033 – Cllr. Michael MacDonncha

Representative: n/a

Submission Location – Kilbarrack (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission shows support in the Project to improve rail services with all the associated benefits for commuters, visitors, the economy and the environment. However, the submission expresses concern for the significant negative effects the Proposed Development would have on DART users along the Howth branch line as it would degrade the service for those users.

Response to Issue Raised

The Applicant welcomes the support for improved rail services with all the associated benefits for commuters, visitors, the economy and the environment.

The Applicant further refers to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission notes its concerns regarding the lack of information on the plans for the use of Howth Junction and Donaghmede station which was relayed at the public consultations with Irish Rail. The submission adds that they were frustrated at being denied a public display in Donaghmede.

Response to Issue Raised

The Applicant refers to section 2.3.1.18 - Concerns of the people of Howth being taken into account

Córas Iompair Éireann & the Project Team have worked hard to communicate widely and clearly with the general public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application (Appendix 3.1 and 3.2). The intentions of the DART+ Coastal North have always been to engage with a wide range of stakeholders and communities to help inform the projects development.

The Applicant acknowledges the concerns raised in relation to engagement the Donaghmede locality throughout the design development. However, it is felt by the Applicant that an appropriate level of consultation has been completed across the extents of the DART+ Coastal North Project since the project commenced.

During Public Consultation No.1 (24th February 2022 to 08th April 2022) a series of 5x online webinars were held to present the Emerging Preferred Option for DART+ Coastal North and to invite feedback from stakeholders and the general public. The consultations were held online as a result of the Covid-19 restrictions in place around the time of the events. The webinars were open to all members of the public and all of the supporting documents were made available through the project website.

During Public Consultation No.2 (09th May 2023 to 23rd June 2023) a series of 3x in-person events were held to present the Preferred Option for DART+ Coastal North, supplemented by an online webinar. The 3x in-person events (Drogheda, Malahide & Sutton) were spread out along the extents of the DART+ Coastal North project so as to make attending an event in-

person as accessible as possible for interested parties, while offering an online webinar option for those people who may have been unable to attend an in-person event.

Both Public Consultation events were widely advertised as described in the PC1 and PC2 Findings Reports. Newspaper advertisements, social media posts, leaflet drops, and in-station posters were all used to try and ensure that as much awareness of the Public Consultation events was raised within the areas most likely to be affected by the DART+ Coastal North project.

In addition to the public consultation events, the Community Liaison Officer and the wider DART+ Coastal North project team have been available to meet with and/or discuss the proposals of the DART+ Coastal North project, throughout the project design development. Furthermore, all published documentation has been readily available through the project website www.dartplus.ie

Further to the above, a copy of the draft Railway Order and the documentation accompanying the application was available for inspection free of charge at Donaghmede Library from September 11th, 2024 for 6 weeks. A copy of all Railway Order application documentation was also available on the Project Website throughout the Statutory Consultation period, and this information remains available to the public.

6.2.27 SB0034 – Dr. Clodagh Cremen, Ms. Almha Cremen

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission urges An Bord Pleanála to “*decline permission to introduce a shuttle service to Howth and interchange at Howth Junction on the basis that the disabled citizens within the area were not consulted or engaged with in a meaningful way, nor were disability bodies, organisations, and advocacy groups*”. The submission further notes that “*there is minimal evidence of any of the recommendations made by the NDA being implemented within the application and no evidence of a Disability Impact Assessment, which is a requirement as part of the application*”. In addition, the submission notes that “*the health effects on this population were largely ignored (in particular the psychological health effects), the risk of an interchange/shuttle service to this population largely undocumented, and mitigation for the same mostly excluded*”. The submission notes that it is the submitters belief, that “*the processes highlighted as part of this aspect of the application are therefore not operating in accordance with the Disability Act (2005), nor the United Nations Convention for the Rights of Persons with Disabilities (UNCRPD)*.”

Response to Issue Raised

The Applicant notes that accessibility is an important aspect of the design of the DART+ Programme and of the DART+ Coastal North project. The project objective is to provide the

rail infrastructure required to enable an increase in the capacity and frequency of service on the Northern Line (inclusive of the Howth Branch). It is noted that, save for the upgrades proposed at Howth Junction & Donaghmede Station, there are no significant interventions to stations proposed as part of DART+ Coastal North. Accessibility considerations were a primary consideration in the design development for the proposed Howth Junction & Donaghmede Station upgrades.

The response provided under Section 2.3.1.6 herein provides a detailed response as to how the Applicant has considered potential impacts on those with a disability, the elderly and the vulnerable throughout the design development to date. This response also details how the wider DART+ Programme (including the fleet) has considered these aspects, as well as the ongoing consultation with key stakeholders in this regard. The use of the service by disabled and other vulnerable persons is given the highest priority regarding the design of the project and wider programme.

The Applicant also notes that significant consultation with key stakeholders has been, and will continue to be, undertaken by the Applicant as part of the DART+ Coastal North project. Two non-statutory public consultations were undertaken, Public Consultation No. 1 (PC1) and Public Consultation No. 2 (PC2). The Applicant considered all the issues raised as part of these, and other consultations, in developing the proposed scheme.

The submission references the recommendations made by the National Disability Authority (NDA). The NDA made a submission as part of PC1. This submission highlighted several key points which needed to be considered by the Applicant, including most importantly the need to adopt and implement universal design principles to ensure *“that each element of the project considers accessibility as a key component to support all users to access transport services so they can participate in mainstream society.”* The submission also noted recommendations in respect of:

- Information and consultation – recommending Irish Rail publish a strategy as to its approach and consult appropriately throughout, including user testing, cross departmental working, disability impact assessment, etc
- Route considerations – reviewing the catchment areas, definition of accessibility
- Infrastructure considerations – the design and location of stations, surfaces, pedestrian pathways, wayfinders, etc as well as reference to the need for compliance with relevant EU Directives and Standards and the European Accessibility Act
- Information considerations – the need to ensure accessible information for all, with reference to the Customer Communications Toolkit for the Public Service - A Universal Design Approach and the need for websites to comply with the EU Directive on Web Accessibility 2016/2102

- Monitoring and Reporting – noting the NDAs statutory role in monitoring the conformance of public bodies such as IE, with the NDAs Code of Practice on the Accessibility of Public Services and Information provided by Public Bodies

The Applicant has considered the issues raised by the NDA in its submission. In particular, the Applicant, as demonstrated in its response under Section 2.3.1.6, considers that accessibility has been a key consideration in the development of the design for the proposed upgrades at Howth Junction & Donaghmede Station. In particular, adding two new larger lifts to the central platform areas, new wider stairs to all areas including up to date compliant handrails and slip resistant finishes. One of the key drivers behind interventions such as removing gatelines, the footbridge central wall and general clutter was to open up these spaces making them more usable and accessible for wheelchairs and buggies. New seating and lighting have also been added to improve the accessibility and usability of the modified areas of the station. The Applicant also notes the significant improvements planned for the DART fleet in terms of accessibility for those with a disability.

The Applicant would also note that consultation with relevant stakeholders, and the further implementation of universal design principles will continue through the detailed design and subsequent phases of the project.

As outlined, the project is seeking to increase the capacity and frequency of service on the Northern Line (inclusive of the Howth Branch). This includes an increase in the frequency of service on the Howth Branch from the current 3 trains per hour to 6 trains per hour during peak periods. To achieve this, infrastructural changes are required and the need for the changes at Howth Junction & Donaghmede Station, including the change which would enable the station to function as an interchange station are clearly explained in the response under Section 2.3.1.2. As detailed in that response, the enhancement of the service on the Howth Branch will include a combination of a direct service to the city centre and a DART shuttle service between Howth and Howth Junction & Donaghmede Station.

Any changes to the operational timetable, including the introduction of a DART shuttle service on the Howth Branch line, will be subject to public consultation by the NTA, (known as the Timetable Customer Consultation Process) prior to implementation, where any concerns of the public to the proposed timetable changes can be raised.

2. Summary of Issue Raised

The submission notes that *“there is no evidence of any consultation, engagement, guidance, or feedback from said Accessibility Users Group anywhere else within the EIAR report, nor within any of the documentation which was included as part of the pre-consultation process that occurred between CIE and An Bord Pleanála.”*

Response to Issue Raised

Extensive consultation with relevant stakeholders has been undertaken to date in respect of the DART+ Coastal North project. In addition to the statutory consultation process, the Applicant has undertaken two non-statutory public consultation periods, significant consultation with the relevant local authorities (including elected members), statutory bodies, non-government organisations and affected landowners. This consultation has helped to inform our options selection process and design development.

The concerns of the people of Howth were particularly raised by respondents to both non-statutory public consultations undertaken as part of the DART+ Coastal North project (PC1 and PC2). Comprehensive responses to the issues raised were provided in the PC1 Findings Report and the PC2 Findings Report, both of which were included in the Railway Order application (Annex A3.1 and Annex A3.2, Volume 4 Appendices of the EIAR).

The Applicant has listened to and responded to these concerns. raised by the people of Howth. With respect to Howth Junction & Donaghmede station, significant concern was raised about the suitability of this station to operate as an interchange station.

The Applicant has listened to the concerns of the public in this regard and has responded directly to this concern in developing the design for DART+ Coastal North. A variety of significant modification works are now proposed to the station, as detailed in Section 4.7.3.1 of the EIAR and the accompanying RO drawings, to “*both improve the passenger experience generally and to develop the station to better serve as an interchange station.*” As detailed therein the EIAR, “*the station works will also involve modifications to the station entrances to provide a more accessible, user friendly and customer focussed station for Donaghmede and Kilbarrack. Upgrades are proposed to the station footbridge and connections to the centre platforms, as well as to the lighting, CCTV system, signage and finishes throughout. The improvement at the Donaghmede entrance will also provide direct access to Platform 4 and connectivity via the footbridge.*” The interchange at Howth Junction & Donaghmede station will also be facilitated by an increase in Northern Line stopping trains which will minimise wait times for connecting services. These measures will significantly improve customer experience and minimise any concerns in respect of security and anti-social behaviour.

6.2.28 SB0035 – Colin Doyle

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission includes a request for an oral hearing. The submission also asks that the board consider the online petition which will include members of the public who may not have had the submission fee easily available.

Response to Issue Raised

Refer to:

- Section 2.2.2 - Request for Oral Hearing and.
- Section 2.2.3 - Observation Cost.

6.2.29 SB0036 – Colm Cahill, Fiona Cahill

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected. Concerns are raised over the potential loss of direct services from Howth.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6.2.30 SB0039 – Daria Lisowska Crowley, Aoife Slattery, Nichola Burgess, Charlotte Kelly, Mick O'Connell

Representative: n/a

Submission Location – Bayside (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would make getting a seat on the train "increasingly difficult" during peak times. The submission adds that this will be worsened

by the growth in demand in services caused by the planned residential developments in Howth and Sutton.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission highlights that the Proposed Development will increase journey times for residents of the Howth peninsula, introducing “unnecessary delays”. This degradation in service, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission includes concerns over Howth Junction & Donaghmede station’s suitability as an interchange point and its ability to deal with larger volumes of passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. The submission says this will lead to further delays.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

5. Summary of Issue Raised

The submission claims that there continues to be issues with accessibility issues at Clongriffin station which previous project were unable to solve. These accessibility issues are faced by wheelchair users and parents with buggies. The submission raises their concern that similar issues and delays will be experienced at Howth Junction & Donaghmede station.

Response to Issue Raised

Accessibility issues experienced at stations across the entire rail network are given all due consideration by Iarnród Éireann. Iarnród Éireann strive to ensure that issues with accessibility, where they arise, are addressed promptly.

Iarnród Éireann continue to monitor all stations across the network and issues arising are dealt with as part of separate projects. These works do not fall within the scope of the DART+ Coastal North Project. Further information is available in Section 2.2.8 in relation to future improvements to Station Amenities (accessibility, public realm).

6.2.31 SB0040 – David Sweeney

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would result in longer journey times for students and commuters alike. The submission claims that the degradation of the DART service would push the additional population into cars and into buses which is already experiencing delays due to there being a single lane into and out of Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,

- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures,
- Section 2.3.1.15 - Concern around increased population in Howth and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would make getting a seat on the train near impossible during peak times.

Response to Issue Raised

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

Concern is raised in relation to over development of the Howth area and under resourcing of public transport. The submission claims that the Proposed Development would lead to greater air pollution due to people resorting to using public transport over the proposed DART. This increase in cars on the road will further exacerbate traffic congestion.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

6.2.32 SB0043 – Donaghmede Estate Residents Association

Representative: Bernard Byrne

Submission Location – Donaghmede

1. Summary of Issue Raised

The submission has raised concern over a perceived lack of consultation and a lack of meaningful engagement from the DART+ Coastal North Project Team in relation to proposals to increase frequency and capacity of DART Services on the Northern Line, and the proposed upgrades at Howth Junction & Donaghmede Station to facilitate the proposed increased in frequency and capacity.

- The Donaghmede Estate Residents Association (DERA) state that they have struggled for over a year to engage meaningfully with the DART + Coastal North Project Team.
- Despite claims of engagement, DERA believe that meaningful discussions and public consultations have not taken place to an acceptable level in the Donaghmede Area.
- DERA feels discriminated against by the Project Team's actions and lack of engagement to date.

Response to Issue Raised

1. Consultation

Córas Iompair Éireann & the Project Team have worked hard to communicate widely and clearly with the general public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application (Appendix 3.1 and 3.2). The intentions of the DART+ Coastal North have always been to engage with a wide range of stakeholders and communities to help inform the Projects development.

The Applicant acknowledges the concerns raised by Donaghmede Estate Residents Association (DERA) in relation to engagement with them and the people of the Donaghmede locality throughout the design development. However, it is felt by the Applicant that an appropriate level of consultation has been completed across the extents of the DART+ Coastal North Project since the Project commenced.

During Public Consultation No.1 (24th February 2022 to 08th April 2022) a series of 5x online webinars were held to present the Emerging Preferred Option for DART+ Coastal North and to invite feedback from stakeholders and the general public. The consultations were held online as a result of the Covid-19 restrictions in place around the time of the events. The webinars were open to all members of the public and all of the supporting documents were made available through the Project website.

During Public Consultation No.2 (09th May 2023 to 23rd June 2023) a series of 3x in-person events were held to present the Preferred Option for DART+ Coastal North, supplemented by an online webinar. The 3x in-person events (Drogheda, Malahide & Sutton) were spread out along the extents of the DART+ Coastal North Project so as to make attending an event in-person as accessible as possible for interested parties, while offering an online webinar option for those people who may have been unable to attend an in-person event.

Both Public Consultation events were widely advertised as described in the PC1 and PC2 Findings Reports. Newspaper advertisements, social media posts, leaflet drops, and in-station posters were all used to try and ensure that as much awareness of the Public Consultation events was raised within the areas most likely to be affected by the DART+ Coastal North Project.

In addition to the public consultation events, the Community Liaison Officer and the wider DART+ Coastal North Project team have been available to meet with and/or discuss the proposals of the DART+ Coastal North Project, throughout the Project design development. Furthermore, all published documentation has been readily available through the Project website www.dartplus.ie

2. Engagement with DERA

Since Public Consultation No.2, as outlined in the submission, the DART+ Coastal North Project team have engaged in depth with Bernard Byrne (Chairman of DERA) and representatives from DERA.

A number of meetings have been held with Mr Byrne and representatives of DERA to ensure that what is being proposed by DART+ Coastal North was clearly communicated and understood. These meetings have been supplemented by written communication, direction to where all relevant published documentation can be found, as well as verbal communications between Bernard Byrne and the Design Team since PC2.

Below is a summary of the in-person consultations which have taken place with the submitter of this submission since PC2:

2023-10-05: Further to written communications on the DART+ Coastal North proposals and requests for further consultation, a meeting was scheduled and took place in the home of Mr Bernard Byrne. The meeting was attended by the Stakeholder Manager and Community Liaison Officer for DART+ Coastal North. The details of the Preferred Option presented at PC2 were discussed in detail, as were the concerns of DERA with regards to the consultation process

2023-11-15: Further to requests from DERA for the DART+ Coastal North Project to be displayed to the people of Donaghmede, a decision was taken to present the Project proposals at the Donaghmede Safety Forum and the range of residents and community representatives who attend the forum. The Project was described in detail and attendees were directed to where additional information could be found if necessary.

2023-12-07: A meeting was held in Connolly Station Board Room between members of the Project Team and representatives of DERA. The meeting was scheduled to discuss the Project proposals with DERA and present some images of the proposed updates at Howth Junction & Donaghmede Station to DERA. DERA representatives made it clear that they do not support the DART+ Coastal North Project and that they felt that a public display should be held in the Donaghmede Shopping Centre.

3. Calls for a Public Display in Donaghmede Shopping Centre

Further to the requests for DART+ Coastal North to hold a public display of project proposals in the Donaghmede Shopping Centre a decision was taken not to hold any further displays of Project information in Donaghmede or elsewhere. This decision was communicated to DERA in writing in a letter dated 11th March 2024.

The concerns of the Donaghmede Estate Residents Association were acknowledged but a decision not to hold any further public displays of information was taken as it was felt that the two extensive consultation periods carried out, which were fully open to the public, were sufficient to inform the public of the Projects proposals. Completing another localised public display was considered to undermine the previous consultation processes which were considered to have been successful in engaging with a wide range of interested parties. It was again noted that the information displayed during these consultation periods remained available to the public through the DART+ Coastal North website should any interested party wish to review it.

4. Discrimination

As communicated multiple times to representatives of DERA, the decision not to hold a public consultation event in the Donaghmede Area was not a decision taken in any way to discriminate against the area. The 3 locations identified for in-person events were considered to provide a good spread of locations along the Project, in locations that would not require excessive travel to reach. The Project team advertised these events extensively with a view to encouraging as many interested parties as possible to attend. The online webinars were also provided to ensure that any interested party could join and partake in the consultation process without needing to travel.

The DART+ Coastal North Project team have remained available throughout the Project development and have continued to engage with DERA to provide detail and clarification of project proposals as required.

At no point during the Project development has there been any intent to discriminate against any area along the Project extents, for any reason. Extensive engagement with stakeholders, residents' associations, landowners, and interested parties from all areas over the duration of the Project development demonstrates how the Project team have engaged willingly with people from all areas along the Project and beyond.

2. Summary of Issue Raised

The submission raises concerns in relation to the impact of the Project on Howth Junction & Donaghmede Station and the local community during the construction phase and with future operations.

Response to Issue Raised

With regards to the concerns raised in the submission relating to potential disruption at Howth Junction & Donaghmede Station it is important to note that any disruption resulting from the Construction Phase will be carefully managed so as to limit the extents of disruption. A detailed Construction Environmental Management Plan (CEMP) and Construction Strategy is included in the EIAR that will form part of the RO application. It is not foreseen that there will be any impact to frequency of services at Howth Junction & Donaghmede Station during the Construction Phase, and commuters passage through the station at this time will be maintained and managed throughout. It is also important to note that there will be no impact on private property associated with the proposed works at Howth Junction & Donaghmede Station as any property impact is contained within Irish Rail and Dublin City Council lands.

During the Operational Phase commuters who avail of Howth Junction & Donaghmede Station will significantly benefit from DART+ Coastal North in the longer term both in terms of the improved rail services and upgrades to Howth Junction & Donaghmede Station that the Project will deliver. Howth Junction & Donaghmede Station is the only station within the Project extents where such improvements and investment are currently proposed.

3. Summary of Issue Raised

The submission calls for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

It is also noted that the submission received does not raise any particular concerns with the DART+ Coastal North proposed interventions or the proposed increases in DART capacity and frequency that the Project proposes to deliver.

6.2.33 SB0044 – Donahies Residents' Association

Representative: Aisling Jones

Submission Location – Donaghmede

1. Summary of Issue Raised

The submission notes that Donaghmede residents welcome the funding allocation and redevelopment of their local DART station “Howth Junction & Donaghmede”.

Response to Issue Raised

The Applicant acknowledges the support from The Donahies Residents' Association which is appreciated.

2. Summary of Issue Raised

The submission refers to concerns relating to the overall planning process for DART+ Coastal North, and a perceived lack of engagement and communication from Córas Iompair Éireann & the Project Team in the Donaghmede Locality:

- Residents feel disheartened by the lack of meaningful engagement and communication from the Irish Rail DART+ project team regarding the redevelopment of the Howth Junction & Donaghmede DART station.
- The Donaghmede Estate Residents Association (DERA) and Donahies Residents' Association claim that Irish Rail failed to engage with local residents and associations, missing opportunities for dialogue and feedback.
- The Project team is accused of taking a wrong approach to stakeholder engagement, ignoring the largest population affected by the redevelopment.
- The submission claims that “the Irish Rail DART+ project team has taken a tokenistic and superficial approach to consultation. This has resulted in ignoring and overlooking the largest population, those in Donaghmede, who will be most impacted by this redevelopment”.

Response to Issue Raised

1. Consultation

Córas Iompair Éireann & the Project Team have worked hard to communicate widely and clearly with the general public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application (Appendix 3.1 and 3.2). The intentions of the DART+ Coastal North have always been to engage with a wide range of stakeholders and communities to help inform the Projects development.

The Applicant acknowledges the concerns raised by Donahies Residents Association in relation to engagement with the people of the Donaghmede locality throughout the design development. However, it is felt by the Applicant that an appropriate level of consultation has been completed across the extents of the DART+ Coastal North Project since the Project commenced.

During Public Consultation No.1 (24th February 2022 to 08th April 2022) a series of 5 online webinars were held to present the Emerging Preferred Option for DART+ Coastal North and to invite feedback from stakeholders and the general public. The consultations were held online as a result of the Covid-19 restrictions in place around the time of the events. The webinars were open to all members of the public and all of the supporting documents were made available through the Project website.

During Public Consultation No.2 (09th May 2023 to 23rd June 2023) a series of 3 in-person events were held, supplemented by an online webinar, to present the Preferred Option for DART+ Coastal North. The 3 in-person events (Drogheda, Malahide & Sutton) were spread out along the extents of the DART+ Coastal North Project so as to make attending an event in-person as accessible as possible for interested parties, while offering an online webinar option for those people who may have been unable to attend an in-person event.

Both Public Consultation events were widely advertised as described in the PC1 and PC2 Findings Reports. Newspaper advertisements, social media posts, leaflet drops, and in-station posters were all used to try and ensure that as much awareness of the Public Consultation events was raised within the area most likely to be affected by the DART+ Coastal North Project.

The Applicant refutes the claim in the submission that the consultation aspect of the Project has been tokenistic. In addition to the public consultation events, the Community Liaison Officer and the wider DART+ Coastal North Project team have been available to meet with and/or discuss the proposals of the DART+ Coastal North Project, throughout the Project design development. Furthermore, all published documentation has been readily available through the Project website www.dartplus.ie.

3. Summary of Issue Raised

The submission notes a lack of public display or information sessions for residents in the vicinity of Howth Junction & Donaghmede Station in relation to the Proposed Development of the station as part of DART+ Coastal North. The Submission claims that in its view *“This engagement is crucial to ensure the proposed project plans aligns with the public's best interests and is suitable for planning review and approval by An Bord Pleanála.”*

Response to Issue Raised

Further to the requests, from Donaghmede Estate Residents Association (DERA), for DART+ Coastal North to hold a public display of project proposals in the Donaghmede Shopping Centre a decision was taken not to hold any further displays of Project information in

Donaghmede or elsewhere. This decision was communicated to DERA in writing in a letter dated 11th March 2024.

The concerns of DERA were acknowledged but a decision not to hold any further public displays of information was taken as it was felt that the two extensive consultation periods carried out, which were fully open to the public, were sufficient to inform the public of the Projects proposals. Completing another localised public display was considered to undermine the previous consultation processes which were considered to have been successful in engaging with a wide range of interested parties. It was again noted that the information displayed during these consultation periods remained available to the public through the DART+ Coastal North website should any interested party wish to review it.

During the Operational Phase commuters who avail of Howth Junction & Donaghmede Station will significantly benefit from DART+ Coastal North in the longer term both in terms of the improved rail services and upgrades to Howth Junction & Donaghmede Station that the Project will deliver. Howth Junction & Donaghmede Station is the only station within the Project extents where such improvements and investment are currently proposed.

4. Summary of Issue Raised

The submission requests that An Bord Pleanála defer approval of the DART+ Coastal North railway order application on the grounds pending meaningful consultation with residents in the Donaghmede area taking place.

The submission notes that *“unless Donaghmede residents are aware of this Project plans and knowledgeable about their content very limited observations will be forthcoming which undermines the entire planning process for this very important project.”*

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

It is also noted that the submission received does not raise any particular concerns with the DART+ Coastal North proposed interventions or the proposed increases in DART capacity and frequency that the Project proposes to deliver.

6.2.34 SB0045 – Donal Hughes

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would worsen delays in commuting for DART users and would also make getting a seat on the train difficult during peak times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point and to break the journey for people travelling to Killester station for the Central Remedial Clinic and the Irish Wheelchair Association. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses and the tourism industry. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved by the plans to increase the level of lighting and cameras.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development “degrades the public transport in the area and is not consistent with the planning conditions.” This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

7. Summary of Issue Raised

The submission requests an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.35 SB0046 – Donna McCauley (Petition 609 signatures)

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concern about contradiction to NTA Projects. It claims that Green School Initiative aims to reduce congestion from students traveling by car. The proposed changes may increase car drop-offs. It also claims that the safe routes to School Initiative

invested in safe access to school grounds. The changes could overwhelm and make drop-off points unsafe.

Response to Issue Raised

The Applicant would like to acknowledge the large number of signatures which support this submission.

Refer to Chapter 2 – The policy context and need for the DART+ Coastal North Project is set out in Chapter 2 of the EIAR, which clearly demonstrates how the DART+ Programme and DART+ Coastal North in particular, are compliant with European, national, regional and local policy frameworks. It is clear that limited frequency and capacity on the DART network, including limited frequency and capacity on the Howth branch line limits the potential growth of new communities along the railway corridor. The need for the Project is set out in Section 2.4 of the EIAR, which includes to facilitate growth in demand. Higher frequency and higher capacity services must be provided to ensure convenient and viable alternatives are available to (current) road users, to promote a modal shift from unsustainable private car usage to public transport.

Refer to Chapter 7 –Chapter 7 Population of the EIAR has assessed the journey characteristics and journey amenity for those utilising the Howth Branch line

Refer to Chapter 6 – Traffic Assessment - Detailed assessment of the four existing level crossings and surrounding network along the Howth Branch Line has concluded that these level crossings can continue to operate and provide an appropriate level of cross connectivity and accessibility whilst still meeting the increased DART service frequency requirement.

2. Summary of Issue Raised

The submission raises concerns about the conflict with Climate Recommendations. It claims that OECD and Irish Climate Change Advisory Council Report recommends sustainable accessibility over high mobility. The proposed changes contradict this by potentially increasing car travel.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

3. Summary of Issue Raised

The submission raises concerns about the limited public transport for students. It claims that the Proposed Development will have an impact on students as many walk 30 minutes to Sutton Station for the DART. Proposed changes would add a shuttle transfer, increasing travel time and inconvenience.

Response to Issue Raised

The primary objective of the DART+ Coastal North project is to deliver the infrastructure that will be required to enable increased train frequency and capacity between Drogheda, and Howth and Dublin City Centre.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

4. Summary of Issue Raised

The submission raises concerns about the potential increase in car travel:

- Likely increase in parents driving students to school due to inconvenient public transport changes.
- Increased car travel could worsen gridlock, especially with frequent railway crossing closures.
- The proposed changes could result in degradation of Public Transport and therefore these changes are seen as a reduction in service quality and accessibility.

Response to Issue Raised

The concerns of parents with children attending local schools are acknowledged by the Applicant. The Applicant would like to refute the claim that the DART+ Coastal North Project will result in a reduction in service quality and accessibility.

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

6.2.36 SB0047 – Dorta and Pawel Lewandowski

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development “degrades the public transport in the area and is not consistent with the planning conditions.” This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and notes that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission is also concerned that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

5. Summary of Issue Raised

The submission requests an oral hearing for further discussion on the Project's negative impacts.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.37 SB0048– Stephen Carberry, Angela Carberry, Dermot Drumm, Derek Drumm

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would be a degradation to the existing service. This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

2. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and property prices. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that the changeover at the Howth Junction & Donaghmede station would make getting a seat on the train difficult during peak times in particular for people with mobility issues.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

6.2.38 SB0050 – Eamon O'Rourke

Representative: n/a

Submission Location – Howth (Relevant to Howth Lodge & Howth Branch)

1. Summary of Issue Raised

The submission indicates that the proposed changes will lead to a downgrade in services between Howth and Dublin. It highlights that reduced seat availability, increased waiting times, and exposure to weather conditions will make travel more challenging, particularly for elderly or infirm passengers, and those traveling with small children.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission raises public safety concerns for DART passengers transiting Howth Junction. The restricted platform space might pose a high risk to passengers, especially during holiday weekends or summer periods.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission raises concerns about the reduced access across the level crossing, which result in the build-up of traffic queues with tailbacks at Baldoyle Road and Sutton Cross encroaching at peak times onto the main Howth Road and at Lauders Lande adding to the Station Road queue.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access.

4. Summary of Issue Raised

The submission claims that Irish Rail did not consider the Projected population growth in Howth, which will significantly exacerbate the area's traffic situation. It also notes that traffic volumes already increase significantly on weekends, causing “bumper-to-bumper tailbacks” between Howth, Sutton, Baldoyle, the Howth Road Junction, and beyond.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

5. Summary of Issue Raised

The submission highlights the error of using “private road” instead of “public road” in the Phase One Consultation documentation for Claremont Crossing (913).

Response to Issue Raised

The Applicant does note that in Appendix A6.1 this road was noted as a private road, but it is acknowledged that this is a public road which provides access to 8 private residences.

6. Summary of Issue Raised

The submission claims that Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877. It notes that the proposed increased closure of Claremont level crossing would effectively reduce and limit this right of way and inevitably be subject to legal challenge.

Response to Issue Raised

Refer to Section 2.3.2.2 - Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877.

7. Summary of Issue Raised

The submissions claims that Irish Rail documentation contains several statements, which were found “misleading”.

Example from the CAF (Common Appraisal Framework) review considerations, Pre-Selection Option Report, section 3.3, page 15: “Maintain provision for through running from Connolly to the Howth Branch Line”.

The submission argues that there would be through running from Connolly to Howth Junction, the proposed transfer point for the proposed Howth “shuttle” service, but there would not be a

through service from Connolly to Howth as there is at present. In addition, the submission raised other points as misleading.

Response to Issue Raised

The Applicant would like to state that at no time was there any intention for any aspect of the documentation to be misleading.

CIÉ is bound by legal requirements in relation to the documents contained in the Railway Order application and the notification pack issued to affected landowners / occupiers. This included a Non-Technical Summary of the EIAR.

In order to ensure all stakeholders understood the proposals and were given a fair opportunity to submit their views to the statutory consultation, the following supports were made available:

- Project web page updated with plain English responses to Frequently Asked Questions
- Project information telephone line and email, for any member of the public to raise queries with the Project team and discuss their individual needs and concerns. Plain English was used both on the phone line and in meetings with the public and property owners / occupiers.
- Members of the Project team were available to meet with affected landowners / occupiers, virtually or at their property through the Project development.
- Members of the Project team were available to meet with any members of the public during the statutory consultation period.

The Project phone number and email were included in the RO pack sent to all properties, and they were encouraged to contact the Project Team with any queries.

Throughout the statutory public consultation phase the Project Team was available and active in assisting people via the Project phone line and email service. This included property owners who sought assistance in reading their property pack during the statutory consultation period.

8. Summary of Issue Raised

The submission argues that the times presented by Irish Rail for barrier closures at four level crossings do not reflect reality. It notes that the actual closure times average 3 to 3.5 minutes.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6.2.39 SB0051 - Eileen and Willie O'Connor, Al Duff, Janet McQuillan, Denis Casey, Noeleen McAdden

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin city Centre to keep their communities connected.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly,

persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.40 SB0052 – Eimear and Liam Quinn

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected. The submission notes concern that the loss of direct services may push commuters back to private car usage. The planned future development of additional apartments in the Howth area is noted as cause for concern.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses and the tourism industry. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

6. Summary of Issue Raised

The submission requests an Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.41 SB0053 – Elaine Hassett, Joshua Hillard

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected and to make commuting accessible and convenient.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submissions raise concerns about issues with recent timetable changes and the prioritising of north-south line users over Howth/Sutton/Bayside users.

Response to Issue Raised

Refer to:

- Section 2.2.20 - Issues with previous timetable changes and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

3. Summary of Issue Raised

The submission highlights the importance of a direct line from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. The demand is rising and removing this direct service will cause negative impacts.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.15 - Concern around increased population in Howth.

4. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station given the history of antisocial behaviour and incidents at this station.

It claims that the proposal subjects passengers from Howth, Sutton, and Bayside to an increased risk of harm.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

7. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that the road space available may not be able to cater to the lengthened tailbacks.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

8. Summary of Issue Raised

The submission requests an Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.42 SB0054 – Emily Davies

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected and make commuting easier.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on access to schools for local students and their parents.

Response to Issue Raised

Refer to Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

7. Summary of Issue Raised

The submission questions the accuracy of the traffic assessment as it claims the assumption that the same volume of car traffic that currently arrives at the level crossings would continue to arrive in future is flawed. The submission claims that the inconvenience of the increased level crossing closures will increase the number of people choosing to drive over taking the DART due to the DART no longer being reliable. This shift of current DART users to car users will increase the volume of traffic on the roads, a factor which wasn't anticipated in the traffic assessment.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

8. Summary of Issue Raised

The submission requests an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.43 SB0055 – Eoghan Duffy, Catherine Bannon

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected and the make commuting easier.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. Impacts on the wider road network are noted.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The submission raises concern for children accessing schools, and to the vulnerable and elderly commuters.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.44 SB0056 – Eva Kane

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected and to make commuting easier.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers. The submission also raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

The submission raises concern with the loss of direct services acting as grounds for existing DART users from the Howth Peninsula reverting from DART usage to private car use.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.45 SB0059 – Francesca Lundstrom

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission clearly objects to the introduction of a shuttle service, the removal of direct dart services, and claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to impacting the emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission mentions the confusing and misleading nature of the naming of the of the level crossing on the Baldoyle Road as “Kilbarrack” given that there is a station with the same name within the Appendix.

Response to Issue Raised

The Applicant in no way intended to cause confusion in relation to the use of naming Kilbarrack in relation to XQ001.

4. Summary of Issue Raised

The submission raises concern with the retention of existing level crossings as a part of DART+ Coastal North on Safety grounds. The submission notes the duration of repair times should vehicles hit level crossing gates.

The submission raises objection to the presence of level crossings forming part of a solution noting *“Aside from all the other important objections to the proposed Shuttle Dart Service between Howth Junction/Donghamede and Howth, this safety issue highlights a fundamental flaw in the whole design and must be taken extremely seriously.”*

Additionally, I came across the following statement from Iarnród Éireann Infrastructure (2019) which stated:

“It is the policy of Coras Iompair Éireann (CIE) and Iarnród Éireann (IE) to remove all railway crossings where possible and practicable on the Irish Railway Network due to health and safety risks associated with the interface between road users and rail traffic”

Until this policy is implemented, I would like to suggest that the Dart + Coastal North plan as it relates to the Shuttle Dart is scrapped or amended to provide a service for passengers on the Howth line with a full and seamless service to the city centre and beyond with the level crossing gates only closed for as short a time as possible until they are replaced with a less hazardous option.”.

Response to Issue Raised

The Applicant acknowledges the risks associated with level crossings around the road and rail network. Where these level crossings can be eliminated, Irish Rail are seeking to remove them.

Driver and rail user safety is of paramount importance to Iarnród Éireann and multiple campaigns have been run over the past number of years to promote safety at level crossings. Iarnród Éireann shall continue to promote safety at level crossings and will continue to work with an Garda Síochána and local authorities to help reduce the dangers associated with level crossing closures.

In the case of the Howth Branch Level crossings the traffic and transport assessment completed and documented in Chapter 6 of the EIAR has concluded that these level crossings can continue to operate and provide an acceptable level of cross connectivity. The closure of these level crossings would result in excessive impacts to the surrounding areas, including to private property, as well as significant costs.

5. Summary of Issue Raised

The submission makes reference to the announcement by Irish Rail of plans to double the number of tracks on its northern route out of Dublin should remove the necessity to switch to a Dart shuttle service for the Howth Peninsula.

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

6.2.46 SB0060 – Gerald Langford

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission also raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

2. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would degrade the public transport in the area which could drive people use their cars over the DART. This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.15 - Concern around increased population in Howth, and

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

6. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.47 SB0061 – Geraldine Nolan

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would degrade the existing service. This degradation, the submission claims, would be “*a step backwards*”.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

2. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would be an inconvenience and could lead to people using their cars over the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission claims that sacrificing residents of Balydoyle, Sutton and Howth to serve another area is not a viable long-term solution.

Response to Issue Raised

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

6.2.48 SB0062 – Gertrude Kenny

Representative: n/a

Submission Location – Howth (Relevant to Howth Lodge & Howth Branch)

1. Summary of Issue Raised

The submission raises concern about the effect of the proposed changes to the DART timetable.

Response to Issue Raised

Refer to:

- Section 2.2.20 - Issues with previous timetable changes and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
 - The people of Howth require clarity.

2. Summary of Issue Raised

The submission claims that the restricted/reduced level of access across Claremont Level Crossing is a particular concern when considering emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access,
- Section 2.3.2.3 - Emergency Services,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission highlights concern about the Proposed Development's impact on traffic along Howth Road in both directions, noting that long waiting times at the level crossings are already an issue.

Response to Issue Raised

Refer to:

- Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission raises concerns about accessibility issues at the station. It emphasises that the Proposed Development does not consider the impact of interchanging at Howth Junction & Donaghmede Station on elderly or physically impaired users.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission requests that proper traffic survey be undertaken on Howth Branch considering future closure times and future increases in traffic.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

6.2.49 SB0063 – Glencarraig Residents Association

Representative: Derek Fennell

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers. Additionally, the submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission raises concerns about the population growth in Howth and the need for services for this increase in population.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

7. Summary of Issue Raised

The submission raises concerns over the potential for negative impacts on School Children and access to schools.

Response to Issue Raised

Refer to Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

6.2.50 SB0065 – Harry Whelehan, Elizabeth Mullan

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about the potential impact on access to homes on the Claremont Road cul-de-sac. The Submission notes concern in relation to a right of way for residents across the Claremont Level Crossing as the only access in and out of their properties.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.2.2 - Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877.

2. Summary of Issue Raised

The submission claims that the restricted/reduced level of access across Claremont Level Crossing is a particular concern when considering emergency services. It notes that these

closures make it difficult to respond quickly in emergency cases, which significantly increases health and safety risks.

Response to Issue Raised

Refer to Section 2.3.2.3 - Emergency Services.

3. Summary of Issue Raised

The submission claims that the residents of Claremont Road accept that some interruption to access is unavoidable. However, they argue that the level of interruption must be "reasonable" to be legally tenable by Irish Rail and within the law and proper planning parameters. At a meeting on 13th September 2024, Irish Rail acknowledged that increases in the number and duration of access interruptions due to level crossing closures must be "reasonable."

The submission notes that the proposed frequency and duration of closures are viewed as "unreasonable" from a legal or planning perspective.

The submission highlights that residents believe any grant of the RO application should include clear, viable, and enforceable preconditions and operational conditions to protect their rights to reasonable access to homes and properties.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

4. Summary of Issue Raised

The submission raises concerns about reduced access at the level crossing, which increases the potential for queuing on Howth Road for vehicles entering Claremont Crossing. It argues that the proposal does not account for the existing dangers during the closure of the Claremont level crossing, where space for only 2-3 cars exists before vehicles back up and block the main road into and out of Howth Lodge. The submission notes that this situation occurs on a dangerous bend and will be exacerbated by the proposed increase in the frequency and duration of level crossing closures.

The submission claims that the current proposal is premature until the effects of increased level crossing closures and frequencies are fully considered through relevant traffic surveys.

Response to Issue Raised

Refer to:

- Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road and

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

5. Summary of Issue Raised

The submission claims that the Projected population growth in Howth will significantly exacerbate the traffic situation in the area.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

6. Summary of Issue Raised

The submission raises concerns about the impact of the Proposed Development on existing DART users along the Howth Branch line. It claims that the changeover at Howth Junction & Donaghmede station would create travel difficulties for older, younger, and less-able commuters, making it inaccessible for certain group of passengers.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

7. Summary of Issue Raised

The submission claims that the proposal provides no benefits to Howth residents to offset the negative impact of removing direct services between Howth and Dublin City Centre. It also highlights the traffic disruption expected at existing level crossings due to increased frequency and longer closure times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

6.2.51 SB0066 – Helen O'Shea, Evelyn O'Shea, Noel O'Shea, Pierce O'Shea

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin city Centre as the population in these areas continue to grow. It claims that the Proposed Development this would degrade the existing service. This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission notes that the loss of a direct train service will push commuters to use the bus service which could put strain on the service. If no additional buses are planned to take these

additional passengers then there could be an increase in car users by the overflow in population.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.4 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

7. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

8. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

9. Summary of Issue Raised

The submission includes a request for an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.52 SB0067 – Howth and District Active Retired Association

Representative: Eugene Fox

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission cites a history of downgrades in public transport servicing Howth over the past years. The submission notes that passengers who have come to rely on using DART services from Howth to Dublin City will be seriously discommoded and delayed as a result of the current proposals to operate a shuttle and require an interchange at Howth Junction & Donaghmede Station resulting in longer journey times.

Response to Issue Raised

Refer to 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

The Applicant notes that the existing train frequency has been limited, as it has in the corridor between Malahide and Bray, by infrastructure constraints at Howth Junction and Donaghmede Station and the line capacity south of Howth Junction and Donaghmede Station. This Project will address these limitations and will enable a doubling of frequency on the Howth Branch in future, subject to future demand for services.

2. Summary of Issue Raised

The submission raises concerns relating to interchange at Howth Junction & Donaghmede Station due to history of anti-social behaviour and poor safety reputation.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics, and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission claims that DART+ Coastal North proposals will have a significant adverse effect on businesses, employers, residents, workers, tourists and visitors to the Howth Peninsula.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

4. Summary of Issue Raised

Submission notes the level of local opposition to the DART+ Coastal North proposals with regard to the Howth Branch and claims that the feelings locally are that the DART+ Coastal North proposals are a very retrograde step for the locality.

Response to Issue Raised

The Applicant acknowledged the level of opposition to the Project from the Howth Branch. The concerns raised during the two public consultation events have been given all due consideration and the Project proposals have been interrogated to ensure that what is proposed by the DART+ Coastal North Project is still considered to be the most appropriate solution given the Project objectives.

The DART+ Coastal North proposals will result in a significant upgrade to the Howth Branch DART services, resulting in a doubling of service frequency over time, in line with future demand.

Feedback received during PC1 has given rise to the substantial level of investment in upgrades to Howth Junction & Donaghmede Station to ensure that it can perform the needs of an interchange station going into the future.

5. Summary of Issue Raised

The submission notes concern over increased level crossing closure frequency on the Howth Branch and the resulting negative impact on traffic in the surrounding areas.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission claims concern for the older population and the additional hardship, delay, frustration, anxiety, anger and inconvenience that an interchange at Howth Junction & Donaghmede Station will introduce to their commutes.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

Iarnród Éireann are very happy to provide assistance to any customer who needs it when travelling with us and 100s of these types of assists are provided across the DART network every day.

7. Summary of Issue Raised

The submission notes that in the view of the Howth and District Active Retired Association DART+ Coastal North, the decision to remove direct train services to Dublin from Howth goes against the aspirations of the All-Island Strategic Rail Review and current government policy to encourage public transport and active travel measures. Current proposals involving an interchange will only serve to encourage the current DART users on the Howth Branch to revert to private car use, therefore exacerbating the traffic chaos.

Response to Issue Raised

The Applicant refutes the claims that the DART+ Coastal North proposals go against the aspirations of National Policy in relation to Sustainable Transport. Statistics support the concept that where additional capacity has been provided that it will promote usage.

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

8. Summary of Issue Raised

Concerns are raised that people will revert to private car use rather than interchanging at Howth Junction and the resulting negative effects in relation to carbon emissions and use of public transport goes against Government Policy.

Response to Issue Raised

Refer to Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

9. Summary of Issue Raised

Submission notes issues with recent timetable changes necessitating further changes in September 2024. It is suggested that any of the proposed changes included in DART+ Coastal North should be tested prior to their introduction to confirm their viability and workability.

Response to Issue Raised

Refer to Section 2.2.20 - Issues with previous timetable changes.

10. Summary of Issue Raised

The submission notes that the information published by Irish Rail regarding the details of the proposed DART service is both confusing and conflicting. It is unclear if the service on the Howth Branch will be a shuttle service, or a shuttle service with some direct trains to Dublin and beyond remaining.

Response to Issue Raised

Every effort has been made in the production of materials supporting the Public Consultation events to be clear, concise and accurate in content.

In relation to providing further clarification on the proposed future operation of a Shuttle service as part of DART+ Coastal North, please refer to Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated - The people of Howth require clarity.

11. Summary of Issue Raised

The submission raises concern that the DART+ Coastal North proposals currently being put forward by Irish Rail are unlikely to be a long-term solution given the changes in the way people live their lives and the continued growth in rail users into the future.

Response to Issue Raised

Iarnród Éireann, in conjunction with the NTA, are constantly reviewing commuter demand with future timetables in mind. The proposals of DART+ Coastal North will provide significant upgrades to the Railway Network serving the north of the GDA, providing the infrastructure to enable additional capacity that will benefit communities into the future.

The DART+ Coastal North Project is provided for as part of the Government's National Development Plan, Project Ireland 2040. It is part of the government's climate action plan, which targets the halving of our greenhouse gas emissions by 2030. The move to frequent, sustainable reliable public transport and reducing reliance on private cars, will help reach this goal.

Should future demand exceed the capacity proposed by DART+ Coastal North, at some in the future, additional supplementary projects may be required to ensure the continued growth of rail infrastructure remains in line with growing demand for services.

12. Summary of Issue Raised

The submission notes the wide variety of train services using the Northern Line, including intercity and Enterprise services, and calls for additional track construction between Clongriffin and Connolly as a minimum investment (4-tracking).

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.2.22 - Issues with existing congestion and resilience of the Northern Line.

13. Summary of Issue Raised

Submission notes issues with rolling stock capacity being limited by platform lengths and also loading gauge being smaller and restricted.

Response to Issue Raised

Iarnród Éireann continue to seek to develop its infrastructure in line with the requirements of the railway and current railway standards. The 10 car DART+ fleet are a similar length to a current 8 carriage DART trains, all platforms on this route are capable of taking that length of a train.

14. Summary of Issue Raised

Consideration should be given to the publication of an agreed Policy Document which can be made available to all Planning Authorities, Developers and all other interested parties to ensure any future developments adjacent to our above or under the railway are carried out so as to make provision of the future installation of additional tracks in order to afford increased capacity.

Response to Issue Raised

The development of public transport strategies and land use planning are a matter for the NTA, the Department of Transport, and Local Authorities and cannot be commented upon by Irish Rail as part of this Railway Order application.

15. Summary of Issue Raised

The submission notes that the removal of direct DART services for Howth Branch does not align with sustainable travel policy.

Response to Issue Raised

As noted above, please refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals for further information on the considerations in relation to Sustainable Travel.

16. Summary of Issue Raised

The submission notes a variety of impacts linked to loss of direct DART services and increased Level Crossing Closure times (section 9 in the submission).

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

17. Summary of Issue Raised

The submission notes that commuters travelling from the North and continuing to Howth will benefit from the availability of empty trains waiting at Howth Junction & Donaghmede Station.

Response to Issue Raised

The Applicant notes the observation in the submission. Furthermore, capacity on receiving trains in all directions of travel under DART+ Coastal North is not expected to be problematic. The infrastructure proposed under the Project will deliver more trains and more frequent services which will provide adequate capacity to cater for demand, both in the current scenario and into the future.

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

18. Summary of Issue Raised

The submission cites a range of impacts linked to the interchange at Howth Junction & Donaghmede Station including:

- Limited shelter
- Lack of station security
- Lack of toilet facilities
- Fear of antisocial behaviour
- Potential for frustration and anxiety to arise among commuters
- Concerns for wheelchair users and station assistance for wheelchair users.
- Lack of space on receiving trains
- Poor experiences interchanging may lead people to seek alternative travel means, such as private car travel.
- Concerns linked to crossing the footbridge between platforms
- Concern with lift performance and interchange reliance of lifts
- Concerns for those with mobility issues

- Concern for safety of elderly people linked to crowds rushing to meet connecting services
- Concern that the footbridge deck may be difficult to navigate for ambulance crews.
- Concerns raised that the Duty of Care which is expected from Iarnród Éireann is absent in relation to the need to interchange at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

19. Summary of Issue Raised

The submission raises concerns that the increased level crossing frequency may have an impact on the emergency services. Fears that increased closures will lead to safety concerns linked to driver impatience.

Response to Issue Raised

Refer to Section 2.3.1.7 - Impact on Emergency services.

The Applicant acknowledges the ongoing issues with poor driver behaviour as a risk associated with level crossings. Iarnród Éireann continue to work with an Garda Síochána, Local Authorities and the NTA to raise awareness of the dangers of level crossings with a view to reducing the safety issues associated with closing level crossings.

20. Summary of Issue Raised

The submission raises concerns relating to the consideration of the increasing population of Howth and the largescale developments currently taking place in the Howth area.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

21. Summary of Issue Raised

The submission refers to events such as the Howth Maritime & Seafood Festival and the large crowds that attend such events. Concerns are raised that the introduction of an interchange at Howth Junction & Donaghmede will mean that the huge volumes of people attending these types of events will pose risks to each other when interchanging as well as when entering and exiting the trains at their destinations. The traffic management at events such as the Maritime & Seafood Festival may need to be applied at Howth Junction as well as at Howth on such events.

Response to Issue Raised

Iarnród Éireann works closely with local authorities and the emergency services to provide safe and reliable services during times of peak demand such as the Howth Maritime and Seafood festival. Advanced plans are made to ensure that all services operate smoothly, and that queueing occurs in a controlled manner. Iarnród Éireann have dedicated event management teams in place to manage such events, that will continue to be the case regardless, if there is a need to interchange at Howth Junction & Donaghmede Station or not. Also, it should be noted for such events, Iarnród Éireann typically offer additional rail capacity, given the expectation that there will be greater numbers travelling to events.

22. Summary of Issue Raised

The submission notes that Iarnród Éireann have a Duty of Care to both employees and commuters. The concerns raised in relation to its Duty of Care are set out in Section 17 of the submission.

Response to Issue Raised

Iarnród Éireann acknowledge the Duty of Care for all staff and commuters and will continue to honour this duty of care as is the case on all our services today.

23. Summary of Issue Raised

The submission raises concern over the potential for sea level changes and risks of increased rain fall and increased risks of flooding.

Response to Issue Raised

Section 10.10.2 of Chapter 10 of the EIAR summarises the Flood Risk in relation to DART+ Coastal North. The section claims that “There are 18no. areas along the proposed scheme where a risk of fluvial flooding, tidal flooding or a combination is identified. Each of these could be considered part of Flood Zone A, as they directly interact with watercourses. Whilst the sections appear to fall within Flood Zone A, the railway line and substation levels within the Proposed Development boundary are >2m above the max flood level at each location. As such and as demonstrated in the site-specific FRA Report (Appendix A10.1 in Volume 4 of this EIAR), the Proposed Development does not propose significant level changes. Five locations throughout the development will be subject to track lowering of a maximum of 0.3m. All tracks are a minimum of 1.35m above flood defence level so the lowering of tracks will not increase flood risk. It is beyond the scope of the Project to mitigate flooding for the existing road network in its entirety. Therefore, there is no significant flood risk to either the railway line, stations or substations within the site boundary.”

24. Summary of Issue Raised

The submission raises concern over the potential for impact on local businesses in Howth.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

25. Summary of Issue Raised

The submission calls on An Bord Pleanála to hold an Oral Hearing as part of the Railway Order Application process.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

26. Summary of Issue Raised

The submission raises concerns that any delays of disruptions to DART services related to the interchange at Howth Junction & Donaghmede may lead to some commuters becoming frustrated and impatient, leading them to take unsafe actions similar to those observed in Bray in 2023 where passengers disembarked and walked along the tracks.

Response to Issue Raised

Customer safety is Iarnród Éireann number one priority. The unfortunate events in Bray in 2023 were largely due to poor communications. A full route and branch review of communications were undertaken after that event and thankfully we have never had such an incident since, despite carrying tens of thousands of customers particularly for large scale events such as Bray Air Show, international matches and large-scale stadium concerts.

The proposals of DART+ Coastal North have been developed to improve the overall reliability and resilience of the Northern Line and Howth Branch so that the potential for delays is in fact reduced. We would stress that it is never safe to disembark from a train between stations unless you expressly asked to do so by a member of staff who is supervising the controlled evacuation of the train.

27. Summary of Issue Raised

The submission calls for any proposals of DART+ Coastal North to be future-proofed. Widening of the existing railway to allow for additional tracks between Howth Junction & Donaghmede and Dublin Connolly is suggested.

Response to Issue Raised

Refer to Section 2.3.1.16 - Need to look at alternatives .

28. Summary of Issue Raised

The submission proposes that DART Speed Bands could be increased to ease the existing track capacity issues.

Response to Issue Raised

Existing speed bands / limits applied to the Northern Line and Howth Branch are applied with both safety and operational considerations in mind. Simply increasing the speed bands on sections of railway which are subject to congestion is not feasible without compromising the safety and operational efficiency of the railway.

29. Summary of Issue Raised

The submission proposes the introduction of skip-stop services on the Northern Line to help address the congestion issues.

Response to Issue Raised

A skip-stop system is already employed on the Northern Line as part of existing timetabling. Consideration is given to efficiencies in the development of all timetables and where it is considered appropriate to do so, revisions to timetables can be made. Any changes to timetables are typically subject to separate consultations, organised by the NTA.

30. Summary of Issue Raised

The submission proposes that Bayside Station would be used as a turnback station as opposed to Howth Junction & Donaghmede station. Positive outcomes of this scenario are listed in section 23 (d) of the submission.

Response to Issue Raised

The primary need for Howth Junction and Donaghmede Station to be used as the turnback location is linked to the capacity issues experienced south of Howth Junction & Donaghmede Station. A maximum capacity of 12 trains per hour can operate on this section of track. Were Bayside Station to be used as a turnback location then this would significantly limit the potential for increasing the number of services North of Howth Junction & Donaghmede Station, which would not allow for the delivery of the frequencies proposed by TSS1C. For every train that passes through Howth Junction and Donaghmede Station to service anywhere on the Howth Branch, one less service can be provided to the North of Howth Junction and Donaghmede Station.

Refer to Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

31. Summary of Issue Raised

The submission calls for the elimination of public road level crossings. Possible options for each of the 4 level crossings are put forward in the submission in section 23 (d) i, ii, iii, iv respectively.

Response to Issue Raised

The potential to close the level crossings has been assessed as part of the design development of DART+ Coastal North.

As previously stated in Section 2.3.1.3, as outlined in Chapter 6 Traffic & Transportation of the EIAR, detailed assessment of the four existing level crossings and surrounding network along the Howth Branch Line has concluded that these level crossings can continue to operate and provide an appropriate level of cross connectivity and accessibility whilst still meeting the increased DART service frequency requirement. The works associated with the closure of any of these level crossings are considered overly impactful on the surrounding areas, overly costly, and unnecessary given current and future traffic volumes. Any such interventions would also result in a significant impact on private properties in the vicinity of the level crossings which need to be avoided wherever possible.

6.2.53 SB0068 – Howth Heritage Society

Representative: Gerald Langford

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

Submission notes no objection to the delivery of higher frequency, higher capacity, reliable, electrified DART services. No objection to solutions improving passenger experience. No objection to sustainable low carbon and climate resilient design solutions making use of existing infrastructure where possible.

Response to Issue Raised

The Applicant acknowledges the submission support for these aspects of the application.

2. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would be a downgrade to the existing service which would create problems for current and future passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. This could hinder and delay bus services as well as private cars.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would not be a “reliable adequate service” as it would make getting a seat on the train difficult during peak times, likely requiring travellers to wait a while to get a train to accommodate them. This could result in people choosing to drive rather than take the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.13 - Capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

7. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures and
- Section 2.3.1.11 - Impact on Tourism.

8. Summary of Issue Raised

Submission calls for an oral hearing to be arranged by an Bord Pleanála.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.54 SB0069 – Howth Lodge Board of Management

Representative: Leo Martin

Submission Location – Howth (Relevant to Howth Lodge & Howth Branch)

1. Summary of Issue Raised

The submission welcomes any investment in improving public transport. However, it emphasises that proposed improvements north of Malahide should not come at the expense of the Howth Branch residents. It calls for Irish Rail to reconsider the current proposal.

Response to Issue Raised

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

2. Summary of Issue Raised

The submission raises concerns about the information published and displayed during the public consultation process. The submitter believes it lacks detail regarding the operational aspects of a shuttle service on the Howth Branch, future timetables, and the negative impacts on the Howth Peninsula due to increased DART frequencies.

The submission highlights vagueness in Irish Rail's proposals, particularly concerning the shuttle service. It queries when timetable changes will be implemented and whether changes to frequency and capacity will occur in the future or upon completion of the DART+ Coastal North Project.

Additionally, the submission notes that the concerns of the Howth Peninsula residents have not been considered throughout the design development.

The submission concludes that the consultation process is flawed and that there has been insufficient consultation with the existing communities of Howth and Sutton.

Response to Issue Raised

Refer to:

- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity,
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account and
- Section 2.2.5 for additional information on the consultation process.

3. Summary of Issue Raised

The submission highlights the error of using "private road" instead of "public road" in the Phase One Consultation documentation for Claremont Crossing (913). This mistake was acknowledged but not rectified in print.

Response to Issue Raised

The Applicant does note that in Appendix A6.1 this road was noted as a private road, but it is acknowledged that this is a public road.

4. Summary of Issue Raised

The submission argues that the times presented by Irish Rail for barrier closures at Claremont Crossing do not reflect reality.

It raises concerns that residents of Howth Lodge and Claremont Road will only be able to access or leave their properties for a minority of each operational hour, which is seen as completely unacceptable.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic

5. Summary of Issue Raised

The submission refers to a legal right of way for residents over the Claremont Level Crossing since a direct service to Howth was initiated in 1877. This right of way would be effectively reduced and limited by the proposed increases in DART service frequency under DART+ Coastal North. It is also noted that the restriction on movement on Howth Road across Claremont Crossing, as envisaged, breaches residents' and citizens' rights to freedom of movement as guaranteed by the Universal Declaration of Human Rights and reinforced by the 1992 Maastricht Treaty.

The submission claims that following a meeting with representatives of Howth Lodge on 13th September 2024, Irish Rail agreed that further research was required on the issue of rights of way. On 21st October, Irish Rail responded, arguing that the issue of level crossings was not relevant to the statutory public consultation. Irish Rail contended that the impact on rights of way was not relevant because changes to the crossing's operation would only occur if the railway order were made. The submission describes this as a prime example of disingenuous sophistry. It notes that the purpose of the Railway Order is to permit changes that will eventually lead to Howth operating as a shuttle service for some or all operational hours, resulting in increased level crossing closures and infringement of legally enshrined rights of way. The details of any subsequent timetable changes are highly relevant to this Railway Order, and thus the Railway Order should be rejected until the full impact of the changes is presented. Whether the increased restriction is reasonable or legal is a matter of law that should be decided now.

The submission concludes that the board of Howth Lodge believes it is unacceptable for Irish Rail to proceed with a view to making the matter a fait accompli if the Railway Order is granted.

Response to Issue Raised

Further to the meeting referred to by the Observer on 13th September 2024, the concerns raised by the representatives of Howth Lodge were given all necessary due consideration. Refer to Section 2.3.2.2 - Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877.

6. Summary of Issue Raised

The submission claims that the restricted/reduced level of access across Claremont Level Crossing is a particular concern when considering emergency services. It notes that these closures make it difficult to respond quickly in emergency cases, which significantly increases health and safety risks.

Response to Issue Raised

Refer to Section 2.3.2.3 - Emergency Services.

7. Summary of Issue Raised

The submission raises concerns about reduced access at the level crossing, which increases the potential for queuing on Howth Road for vehicles entering Claremont Crossing. The submission notes that this situation occurs on a dangerous bend and will be exacerbated by the proposed increase in the frequency and duration of level crossing closures.

Response to Issue Raised

Refer to Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road.

8. Summary of Issue Raised

The submission raises concerns about traffic congestion due to the increased frequency of closures at the four level crossings along the Howth Branch. Further clarity on the effects of this congestion is sought.

It notes that the Applicant's traffic assessments are based on future timetable assumptions but argues that this does not provide the necessary clarity for the people of Howth.

The relevance of the traffic data used in these assessments is questioned, as it is four years out of date. The submission also highlights the exclusion of peak holiday and weekend traffic from the assessments.

There is a concern that commuters might choose to drive rather than use a DART service that requires an interchange at Howth Junction & Donaghmede, potentially reducing public transport use and increasing traffic congestion.

Finally, the submission points out the omission of future housing developments from the traffic assessments and calls for an independent traffic assessment of Sutton Cross.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

9. Summary of Issue Raised

The submission notes that the proposed shuttle service is seen as a downgrade of services between Howth and Dublin Connolly. There is a feeling that the benefits of DART+ Coastal North are focused on areas north of Malahide, to the detriment of the people of Howth.

The submission raises concerns about the lack of certainty regarding when commuters will need to interchange at Howth Junction and when new timetables will be introduced.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account

10. Summary of Issue Raised

The submission notes that while benefits in other areas were included in the consultation documentation, none are relevant to the Howth Area. It raises concerns that potentially negative impacts are excluded from public consultation materials.

Additionally, the submission points out that the railway order materials were not displayed in Howth Library, unlike in other locations along the Northern Line.

Response to Issue Raised

Refer to:

- Section 2.2.4 - Inadequate time to read the documentation
- Section 2.2.5 - Insufficient communications and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

11. Summary of Issue Raised

The submission notes that Howth Junction will be upgraded but will remain inconvenient and challenging for the elderly and school students, the two most regular DART users. Transfers at Howth Junction will require a platform change on the inward journey and use of the existing footbridge on the return. Although Irish Rail has kept timetable proposals vague, it seems clear that only a shuttle service is intended at peak hours. Thus, Howth Junction will be used for

transfers when it is busiest. The restricted platform space, even after planned work, will pose a risk to the elderly and young and is unlikely to cope with holiday traffic and tourist visits.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity.

12. Summary of Issue Raised

The submission raises concerns about the impacts on tourism and local businesses in Howth. It notes that around 1 million tourists visit Howth each year, and the loss of a direct service to Howth would significantly affect the economy of the Greater Dublin Area, particularly Howth businesses. There has been no financial impact assessment of these proposed Dart changes.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6.2.55 SB0070 - Howth Sutton Autism Friendly Community

1. Summary of Issue Raised

The submission claims that the proposed removal of direct train services between Bayside, Sutton, Howth, and Dublin will negatively affect the independence and mobility of autistic individuals in the community.

The submission notes that the current service has enabled autistic adults and children to develop freedom and predictability in their daily lives, which would be jeopardized by the proposed changes. It emphasises concern that requiring transfers at Howth Junction, with crowded platforms and unpredictable logistics, will cause extreme anxiety and distress for many autistic individuals, potentially isolating them further.

The submission emphasises that the proposed changes are seen as retrograde, undermining Ireland's commitment to the United Nations Convention on the Rights of Persons with Disabilities, by creating additional barriers for people with disabilities.

(The submission is supported by AsIAm, Ireland's leading autism charity, and its CEO, Adam Harris, adding national advocacy to the concerns raised.)

Response to Issue Raised

The Applicant acknowledges the concerns raised by the submission.

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6.2.56 SB0071 – Howth Sutton Community Council (HSCC) CLG

Representative: Andrew Smith

Submission Location – Howth/Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The proposal to replace direct DART services with a shuttle is seen as a downgrade that diminishes service quality and passenger convenience. The submission raises concern with the inconvenience and journey time impacts associated with a need to interchange and also whether there will be capacity available on receiving trains arriving from the north.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The need to change trains at Howth Junction creates significant challenges for people with disabilities due to unreliable lifts, stairs, and complex transfers. The station's platform redesign and limited capacity will struggle to handle increased passenger volumes, raising safety concerns.

Response to Issue Raised

Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The Submission notes concerns based on existing DART services being used by large numbers of First, Second and Third level students who will, in the view of the Observer, be negatively impacted by the proposed development.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

4. Summary of Issue Raised

The submission notes concern related to the need for direct DART services by many care givers, nurses, and hospitality staff, noting that local businesses may be negatively impacted by the proposals of the DART+ Coastal North project.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

5. Summary of Issue Raised

The submission raises concern in relation to the proposed interchange at Howth Junction & Donaghmede Station in relation to security, functionality, and accessibility.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised:

The submission notes that the proposal does not take tourist traffic and preferences into account.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

7. Summary of Issue Raised:

The submission notes the scale of use of DART services from the Howth Branch and notes that the introduction of a shuttle service would be seen as a downgrade in service.

Response to Issue Raised

Iarnród Éireann acknowledges and appreciates the volume of commuters who avail of DART services on the Howth Branch. Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

8. Summary of Issue Raised:

The submission notes that the shuttle proposal is contrary to the Dublin Transport Authority Act 2008. Concerns are raised in relation to National and Local Transport Policy and Goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

9. Summary of Issue Raised:

The submission claims that the increased crossing closures will cause severe congestion, with knock-on effects on road users, emergency services, and public safety.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

10. Summary of Issue Raised:

The submission notes the general opposition from those the Observer had heard from in relation to the proposals to introduce a Shuttle Service in future as part of the DART+ Coastal North proposals.

Response to Issue Raised

The Applicant acknowledges the feelings expressed by those referred to in the submission. However, the Applicant refutes that the proposals of DART+ Coastal North constitute a downgrading of services on the Howth Branch.

Refer to:

- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account

6.2.57 SB0072 – Howth Tidy Towns

Representative: Nichola Chambers

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow and to maintain community connectivity. It claims that the Proposed Development would degrade the public transport in the area. This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes that the likely frustration caused by longer wait times.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.2.14 - Air Quality/Dust,
- Section 2.2.16 - Health Concerns and
- Section 2.2.17 - Biodiversity.

3. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised

The submission requests an Oral Hearing to address and discuss the significant negative impacts of the proposed changes.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.58 SB0074 – Ian and Sheila Sanders

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would not be an “inconvenience” as it would make journey times longer.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

4. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6.2.59 SB0077 – Jack McDonnell

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would be of “inconvenience” and would also make journey times longer. The shuttle service will also make getting a seat on the train “near impossible” during peak times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable,
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times and that the road space available may not be able to cater to the lengthened tailbacks.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would degrade the public transport in the area and it would be in opposition to public policy of reducing car dependency.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

6.2.60 SB0078 – James and Emma Bradley

Representative: n/a

Submission Location – Howth (Relevant to Howth Lodge & Howth Branch)

1. Summary of Issue Raised

The submission claims that the proposed changes would increase the frequency of level crossing closures at Howth, potentially leaving residents "trapped" on their side for extended periods. It notes that frequent train stoppages would worsen traffic backups on Howth Road, creating dangerous conditions, particularly on bends and near intersections. The increased volume of vehicles and larger trucks on Howth Road exacerbates risks for residents and commuters waiting at the crossing.

The submission notes a potential to better coordinate the crossing of trains at level crossings, acknowledging that this may not happen everywhere.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.2.3 - Emergency Services,
- Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road and
- Section 2.3.1.4 - Improvements/ Optimisation of Level Crossings.

2. Summary of Issue Raised

The submission highlights concern about safety, antisocial behaviour, and poor design, deeming it unsuitable for increased passenger transfers. It also notes that increased crowding at Howth Junction and disruptions to direct services may deter tourists and visitors, potentially harming Howth's economy.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission highlights accessibility issues with the Proposed Development's plan to use Howth Junction as an interchange point. It notes that broken lifts and platform changes at Howth Junction disproportionately affect users with mobility issues.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission notes potential for increases in closure times at other level crossings, in particular Station Road and Baldoyle Road in Sutton will exacerbate existing traffic congestion issues.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6.2.61 SB0079 – James and Margaret Lillis

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes the benefits of the proposed DART+ Coastal North Project.

It highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would degrade the public transport in the area. This degradation, the submission claims, would be in opposition to public policy of reducing car dependency.

The submission notes that the core problem with the north Dublin rail system is the lack of investment in expanding the rail infrastructure into Connolly station. 2 lines servicing a growing

commuter belt plus an express train to Belfast is not feasible. Curtailing the service to one area in order to expand services to another area is not the answer. The observer notes that in their opinion the feedback from the people of Howth has not been taken into account by the Applicant.

The submission calls for the Bord to insist that CIE revise their plans and continue direct services To Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.16 - Need to look at alternatives and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

2. Summary of Issue Raised

The submission raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures

3. Summary of Issue Raised

The submission questions the accuracy of the traffic assessment as it claims the assumption that the same volume of car traffic that currently arrives at the level crossings would continue to arrive in future is flawed. The submission claims that the model does not take into account the planned increase in population of the Howth peninsula.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

4. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART. The future growth of the Howth population linked to developments is raised as a contributing factor to concerns.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

7. Summary of Issue Raised

A public hearing is requested to fully address the significant negative impacts of the proposed plans on affected communities.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.62 SB0080 – James Murphy, Miriam Harrison

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission notes this will lead to more frustration in drivers.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission highlights Sustainable Travel concern and climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses where the Proposed Development could lead to delays in deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6.2.63 SB0081 – Jennifer Hughes

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development has not considered the view of citizens living in the Howth area and is providing service to those living in North County Dublin and County Louth by removing service to Howth/Sutton/Bayside.

Concerns over the need to interchange at Howth Junction are noted.

Response to Issue Raised

Refer to:

- Section 2.3.1.18 - Concerns of the people of Howth being taken into account,
- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity.

3. Summary of Issue Raised

The submission highlights the climate concerns with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behavior around Howth Junction and Donaghmede station and that this concern was not resolved at the public consultations with Irish Rail.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would not be a "reliable adequate service" as it would make getting a seat on the train difficult during peak times, likely requiring travellers to wait a while to get a train to accommodate them.

Response to Issue Raised

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

7. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross. The submission also raises their concerns that an increase in the time the level crossing barriers are closed will negatively impact road users commuting to work or school in addition to emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

8. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

9. Summary of Issue Raised

The submission questions the accuracy of the traffic assessment as it claims the assumption that the same volume of car traffic that currently arrives at the level crossings would continue to arrive in future is flawed. The planned increase in population on the peninsula has not been included in the assessment.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

10. Summary of Issue Raised

The submission notes Irish Rail's plan to expand the Northern Line to four lines between Connolly Station and Malahide could provide the needed capacity, making the removal of direct DART services from Howth/Sutton/Bayside unnecessary. The need to consider the JASPERS review is noted.

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and

- Section 2.3.1.16 - Need to look at alternatives .

6.2.64 SB0083 – John and Maria Lonergan

Representative: n/a

Submission Location – Bayside (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre to keep their communities connected.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that there would be accessibility and safety issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and

- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

4. Summary of Issue Raised

The submission provides to alternative solutions:

- Allow moderate increase in rail traffic to Howth by increasing length of some trains
- Proposed increase in the size of trains to allow for increased volume on the Belfast and Drogheda lines might help to reduce the proposed increase in frequency of trains.

Response to Issue Raised

The Applicant notes that the services currently operate up to maximum train lengths (8 carriage trains) and it is not permissible on the current infrastructure to extend these train lengths beyond what we do today.

Two obvious risks to further extension are related to carriages with doors enabled not opening onto a platform, and the impact of longer trains on existing infrastructure, particularly where the platform is within close proximity to level crossings. The ability to extend platforms to allow for longer trains would also require assessment to establish whether it's feasible or possible, and this is not considered within the scope of DART+ Coastal North.

Section 2.3.1.16 - Need to look at alternatives .

6.2.65 SB0084 – John Flanagan

Representative: n/a

Submission Location – Clontarf (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the long-term use of Cosh crossing establishes a legal right of way. The existing legal precedence in Irish Courts supports this claim. It notes that proposed changes disregard these legal rights.

Response to Issue Raised

Cosh Crossing (915) carries Lauder's Lane over the railway line, connecting one side of the Sutton Golf Club to the other.

Regarding the issue raised with respect to the legal right of way, the Applicant notes that Section 45 of the Transport (Railway Infrastructure) Act 2001 provides that a railway order, if granted, may authorise the Applicant to "*acquire compulsorily any land or rights in, under or over land or any substratum of land specified in the order*".

It is submitted that there is a need for an increased frequency of train services on the Howth Branch and that the improvement in public transport will be in the best interests of the residents of Howth. It is acknowledged that an increase in rail traffic will increase the amount of time during which the crossings will be closed, although it may be some time before the frequency of service increases from three trains per hour to six trains per hour.

The Applicant would also note that while the proposed Cosh level crossing closure frequency and duration will increase, it will remain in line with, and below, existing current level crossing closure durations and frequencies in other parts of the DART and rail network (Section 4-8 in Appendix A6.1 of the EIAR).

2. Summary of Issue Raised

The submission emphasises that there was an increased frequency and duration of gate closures in the past two years. It notes that the proposal likely to worsen closure times.

Response to Issue Raised

Cosh Crossing (915) carries Lauder's Lane over the railway line, connecting one side of the Sutton Golf Club to the other.

No infrastructural changes are proposed in this location. However, the DART+ Coastal North Project, through infrastructural changes at Howth Junction & Donaghmede Station and elsewhere on the DART network, is enabling an increase in the frequency of service along the Howth Branch, from 3 trains per hour to 6 trains per hour, during peak periods.

This increased level of service will increase the frequency and duration of the level crossing closures along the Howth Branch, including at Cosh level crossing. The Applicant acknowledges that this will have an impact on the Sutton Club members as a result.

It is important to note that the future operational timetable will be developed over time, as demand increases. However, to assess a reasonable worst case, we have looked at the scenario where we have the full 6 trains per hour (e.g. during peak periods).

Cosh level crossing is currently closed 3 times per hour (when there are 3 trains per hour operating), for between approximately 2 and 5 minutes each time, which amounts on average to c. 20% of the time.

Table 4.29 Comparison of Level Crossing Closure Times – Cosh (915)

Location	Number of Closures per hour	Total closure time per hour	Minimum single closure time	Maximum single closure time	Assessed Timetable
Baseline Cosh (915) Level Crossing	3	00:11:13	00:02:16	00:05:13	00:03:44
Proposed Cosh (915) Level Crossing	6 or 12	00:17:58 to 00:30:03	00:02:30	00:05:01	00:05:01 6 times per hour

When, in the future, the demand increases and the full-service enhancement delivered by DART+ Coastal North is realised, (i.e. 6 trains per hour during peak periods), the level crossing closure frequency may increase beyond this. The number of closures is likely to be 12 times per hour as it is assumed that the future operational timetables will prioritise having minimal impact on the most critical level crossing between Howth Junction and Howth.

Again, depending on the future operational timetable the closure durations will also likely increase from the current closure time of between approximately 2 and 5 minutes. This equates to the level crossing being closed for up to a maximum of 50% of the time, during peak periods.

The Applicant notes that, at other times, when train frequency is below the maximum 6 trains per hour, the level crossing closure frequency and durations would reduce.

In terms of traffic at this level crossing, the surveys carried out as part of the EIAR, which were done in accordance with best practice and guidance (see Section 6.3 of Chapter 6 Traffic & Transportation in the EIAR), show that the volume of vehicles crossing Cosh (915) Level Crossing is relatively low. Surveys have shown only 23 vehicles travelling northbound and 25 travelling southbound across the rail line between 08:00 and 09:00; and 48 northbound and 24 southbound between 17:30 and 18:30.

In terms of pedestrians, surveys have shown 510 pedestrians crossing the level crossing between 06:00 and 20:00.

Therefore, while the likelihood of vehicles incurring delay will increase in the future due to the increased train frequency, it is not expected to have a significant impact in terms of queuing/waiting, due to the low volumes of vehicles.

Similarly, the likelihood for pedestrians / golf members to incur delay at a level crossing will increase. However, the wait time for pedestrians / golf members at these closures is expected to continue to be around 2 minutes to 5 minutes.

The Applicant would also note that while the proposed Cosh level crossing closure frequency and duration will increase, it will remain in line with, and below, existing current level crossing

closure durations and frequencies in other parts of the DART and rail network (Section 4-8 in Appendix A6.1 of the EIAR).

3. Summary of Issue Raised

The submission emphasizes that prolonged gate closures pose health risks to club members and visitors. It highlights that emergency vehicle access could be obstructed, thereby increasing the risk during emergencies. Additionally, it points out the heightened risk of accidents from individuals climbing over or squeezing through the gates.

Response to Issue Raised

Cosh Crossing (915) carries Lauder's Lane over the railway line, connecting one side of the Sutton Golf Club to the other.

The Applicant notes that consultation with representatives from the Emergency Services (Fire Service) has taken place to ensure that the requirements of these vital services are met by DART+ Coastal North. No issues were raised by the Fire Service regarding the proposals.

It is important to note that there are level crossings across the rail network where emergency services are accommodated without any significant issues on a daily basis. In the event of a level crossing closure, the lane of opposing traffic (to where the queuing takes place) will be empty because of a closure, allowing for emergency services to easily bypass queuing traffic and get to the front of the traffic queue, minimising any delays.

In terms of traffic at this level crossing, the surveys carried out as part of the EIAR, which were done in accordance with best practice and guidance (see Section 6.3 of Chapter 6 Traffic & Transportation in the EIAR), show that the volume of vehicles crossing Cosh (915) Level Crossing is relatively low. Surveys have shown only 23 vehicles travelling northbound and 25 travelling southbound across the rail line between 08:00 and 09:00; and 48 northbound and 24 southbound between 17:30 and 18:30.

In a worst-case scenario, our modelling has indicated that the maximum level crossing closure times will remain similar to that of today. Therefore, while the likelihood of emergency vehicles incurring delay will increase in the future due to the increased train frequency, it is not expected to have a significant impact in terms of queuing/waiting, due to the low volumes of vehicles.

4. Summary of Issue Raised

The submission raises concern about the negative impact on business:

- Sutton Golf Club's financial stability at risk due to potential increase in gate closures.
- Negative impact on visitor experience and ability to attract new members.

Response to Issue Raised

Cosh Crossing (915) carries Lauder's Lane over the railway line, connecting one side of the Sutton Golf Club to the other. The 9-hole course is spread over both sides of the DART line

with three holes to the south. Golfers therefore need to use the level crossing to cross from one side to the other.

Extended delays are inconvenient and can allow the next group of players to catch up with the previous group. The modelling indicates a negative impact due to an increase in the frequency of delays. Although wait times will continue to be short at between 2 to 5 minutes, a moderate negative impact on the amenity of golfers can be expected due to the effect of additional delay to the transition between groups of players.

The Applicant acknowledges that this will have an impact on the Sutton Club members as a result.

6.2.66 SB0085 – John Towers

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It claims that the Proposed Development would degrade the public transport in the area increasing journey times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. The submission claims that given Irish Rail's history with out of order lifts, this change which would require different platforms would be of detriment to wheelchair users, the elderly, persons with buggies or heavy baggage as there would be little faith in the lifts at the station being functional.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission includes its concern with the use of Howth Junction and Donaghmede as it is exposed to the weather. It raises the fact that the plans for the Proposed Development do not include the provision of shelter improvements for passengers waiting on the middle platform of the station. The submission adds that there is a history of antisocial behaviour and incidents at this station. It claims that the proposal subjects passengers from Howth, Sutton, and Bayside to an increased risk of harm.

Response to Issue Raised

Section 2.3.1.6 details the proposed upgrades to the Howth Junction & Donaghmede Station which will both improve the passenger experience generally and develop the station to better serve as an interchange station into the future. This includes for example (and addressing specific concerns raised in some of the submissions) the provision of additional shelter on the platforms for those who might be interchanging in the future.

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the changeover at the Howth Junction & Donaghmede station would be of “inconvenience” and could make people choose to drive rather than take the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road Junction and Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses, the tourism industry and local amenity use. In the submission it claims that the disruption to the DART line could deter tourists or force them into cars instead of using the DART.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

7. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

8. Summary of Issue Raised

The submission requests an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.67 SB0087 – Joseph O'Connor

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims objection to the removal of direct DART services from Howth and the introduction of a shuttle service, noting that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission highlights climate related concerns associated with the loss of the direct DART line which could result in people choosing to drive over taking the DART shuttle. This degradation, the submission claims, would be in opposition to national transport and climate policy of reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission includes a request for oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.68 SB0091 – Leo Martin

Representative: n/a

Submission Location – Howth (Relevant to Howth Lodge & Howth Branch)

1. Summary of Issue Raised

The submission notes its support for the extension of DART services to Drogheda, inclusive of all stations served. The submission notes its objection to the elements of the DART+ Coastal North Proposed Development affecting the existing Howth Branch services including a perceived downgrading of existing DART services on the Howth Branch. Furthermore, it raises concerns over seat availability and inconvenience to passengers when changing trains at Howth Junction. The submission also notes that there would be an exposure to the prevailing weather conditions at the station that can create additional challenges for elderly, infirm passengers or anyone traveling with small children.

Response to Issue Raised

The Applicant acknowledges and appreciates the support for the project stated in the submission.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of a Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of trains arriving from the North at Howth Junction & Donaghmede Station.

2. Summary of Issue Raised

The submission raises concerns about safety and accessibility issues at the station. It notes that the need to change platforms at Howth Junction may create inconvenience and pose risks to passengers due to overcrowding. Additionally, it highlights that the platforms are too small for the number of passengers traveling during holidays.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission claims that the Projected population growth due to new developments in Howth will significantly exacerbate the traffic situation in the area.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

4. Summary of Issue Raised

The submission claims that more frequent level crossing would result in the build-up of traffic queues with tailbacks at Baldoyle Road and Sutton Cross encroaching at peak times onto the main Howth Road and at Lauders Lane adding to the Station Road queue.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.4 – Improvements/Optimisation of Level Crossings.

5. Summary of Issue Raised

The submission highlights the error of using "private road" instead of "public road" in the Phase One Consultation documentation for Claremont Crossing (913).

Response to Issue Raised

The Applicant does note that in Appendix A6.1 this road was noted as a private road, but it is acknowledged that this is a public road which provides access to 8 private residences

6. Summary of Issue Raised

The submission claims that Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877. It notes that the proposed increased closure of Claremont level crossing would effectively reduce and limit this right of way and inevitably be subject to legal challenge.

Response to Issue Raised

Refer to Section 2.3.2.2 – Claremont level crossing is a legal right of way since a direct service to Howth was initiated in 1877.

7. Summary of Issue Raised

The submissions claims that Irish Rail documentation contains several statements, which were found “misleading”.

Example from Executive Summary, page 4 and repeated on page 12: “The removal of crossing conflicts at Howth Junction will also result in a more frequent and reliable Howth DART service at every ten minutes each way, with a change at Howth Junction to access the Northern Line”.

The submission argues that Connolly station is a “chokepoint”, not Howth Junction. In addition, the submission raised other points as misleading.

Response to Issue Raised

The Applicant in no way intends for any information contained in the Railway Order Application to be considered misleading.

CIÉ is bound by legal requirements in relation to the documents contained in the Railway Order application. This included a Non-Technical Summary of the EIAR. In order to ensure all stakeholders understood the proposals and were given a fair opportunity to submit their views during the statutory consultation, the following supports were made available:

- Project web page updated with plain English responses to Frequently Asked Questions
- Project information telephone line and email, for any member of the public to raise queries with the Project team and discuss their individual needs and concerns. Plain English was used both on the phone line and in meetings with the public and property owners / occupiers.
- Members of the Project team were available to meet with affected landowners / occupiers, virtually or at their property through the Project development.
- Members of the Project team were available to meet with any members of the public during the statutory consultation period.

The Project phone number and email were included in the RO pack sent to all properties, and they were encouraged to contact the Project Team with any queries.

Throughout the statutory public consultation phase the Project Team was available and active in assisting people via the Project phone line and email service. This included property owners who sought assistance in reading their property pack during the statutory consultation period.

Further clarification on points raised frequently as part of the Statutory Consultation phase have been included as part of the response document to provide further information.

6.2.69 SB0092 – Les Doyle

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes strong opposition to the parts of the proposal resulting in the ending of direct DART services to Howth and also highlights historical concerns about anti-social behaviour around Howth Junction.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

2. Summary of Issue Raised

The submission notes that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission supports the further extension of the DART service to facilitate Drogheda but request the existing direct service to be retained.

Response to Issue Raised

The Applicant acknowledges the support for the Proposed Development offered in the submission and appreciates all positive feedback received.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

6.2.70 SB0093 – Lisa Cunningham

Representative: n/a. Submission signed on behalf of 42 Others.

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the loss of direct service will negatively impact local businesses that rely on the elderly as their primary customer base.

Response to Issue Raised

- Refer to: Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

2. Summary of Issue Raised

The submission highlights safety concerns around Howth Junction and notes that this will push commuters back towards private car use.

Response to Issue Raised

Refer to:

- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It claims that this will negatively impact road transport network, especially fire and emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and

- Section 2.3.1.7 - Impact on Emergency services.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects elderly and parents with young kids due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission raises concerns about longer traveling times, especially for commuters.

Response to Issue Raised

Refer to Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

7. Summary of Issue Raised

The submission raises concerns about the increase in population in Howth and the resultant demand for public transport.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

6.2.71 SB0094 – Lizanne Kelly

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that direct DART services are vital for keeping communities connected.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are. The submission emphasises it will have negative impact on wider road transport network including bus services.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and wheelchair users due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses in Baldoyle, Sutton and Howth. It claims that businesses will have to “grapple with delays” to their deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission requests an Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.72 SB0095 – Lorcan Blake

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that Sutton Cross is already a chokepoint for traffic with significant congestion. The DART+ Coastal North proposals have the potential to worsen an already very congested area, particularly around Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission objects to the removal of direct DART services to Howth during peak periods. It emphasises that frequent level crossing will increase waiting times and negatively affect road users, pedestrians and cyclists.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission raises concerns about the downgrade in services due to the need to change at Howth Junction station. It also raises concerns about seat availability and inconvenience for passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities due to unreliable lifts at Howth Junction. Concerns for the elderly and those with children are also raised, as are potential issues with lift performance.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission highlights safety concerns around Howth Junction.

Response to Issue Raised

Refer to 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

7. Summary of Issue Raised

The submission requests an Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.73 SB0096 – Bryan and Louise Lynch

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about downgrading of service from a direct line to a shuttle service from Howth and claims that it is against public policy of sustainable transport.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

2. Summary of Issue Raised

The submission raises concerns about the station's facilities and the overall use of Howth Junction, noting that it is exposed to the weather. It claims that the proposed upgrade to the station is an unnecessary expense. It also claims that empty carriages are required for people to transfer from the direct line onto the shuttle service at Howth Junction.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable,
- Section 2.2.8 - Improvement to Station Amenities (accessibility, public realm) and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission raises concerns about accessibility issues at Howth Junction, as there is no permanent staff to assist disabled passengers, with lifts tend to be full, especially during the

rush hour. It also raises concerns over train capacity and seat availability that will cause difficulties for disabled passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It emphasises that this will negatively impact transport network.

Response to Issue Raised

Refer to 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

5. Summary of Issue Raised

The submission claims that commuters in Sutton and Howth would be satisfied to keep the direct service with only 3 trains per hour.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

6. Summary of Issue Raised

The submission calls for an oral hearing.

Response to Issue Raised

Refer to 2.2.2 - Request for Oral Hearing.

6.2.74 SB0097 – Louise Whelan

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission claims that the

changeover at the Howth Junction will extend journey times and result in overall downgrade of services, especially for elderly and disabled passengers. It also emphasises the loss of direct services will encourage people to use private vehicles at a time when traffic in the area is already heavily congested.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are. It also emphasises that this might have a negative impact on wider transport network and emergency service operations.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and wheelchair users due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

6. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas. It claims that many people were not aware of the ongoing public consultation and new DART proposal.

Response to Issue Raised

Refer to:

- Section 2.3.1.15 - Concern around increased population in Howth,
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account and
- Section 2.2.5 - Insufficient communications.

7. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry and local businesses in Baldoyle, Sutton and Howth. It claims that businesses will have to “grapple with delays” to their deliveries and longer journey times for staff and customers. It will also endanger tourism to the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

8. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

9. Summary of Issue Raised

The submission request to consider alternative solution to provide four tracks between Connolly Station and Malahide to facilitate the separation of commuter and intercity services.

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

10. Summary of Issue Raised

The submission raises concern over reaction of residents. It claims that over 4,000 people signed the petition with objection on proposed plan.

Response to Issue Raised

The Applicant, and the DART+ Coastal North project team fully appreciate, and have been fully aware of, the level of opposition to the project proposals with regard to the Howth Branch through the feedback received during the two non-statutory public consultations.

The feedback received through the development of the project has been given all due consideration and has helped shape the project development.

Refer to:

- Section 2.3.1.18 - Concerns of the people of Howth being taken into account and
- Section 2.2.5 - Insufficient communications.

6.2.75 SB0098 – Louise Whelan, Ann Shaw, Catherine Whelan

Representative: n/a

Submission Location – Bayside (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that direct DART services are vital for keeping communities connected.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It emphasises that this will negatively impact wider transport network, bus, ambulance and fire services operation.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission highlights accessibility and safety issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, wheelchair users and parents with young children due unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns about possible train capacity issues and congestion on station platforms due growing population in the feeder areas.

Concerns are raised in relation to accessibility at Howth Junction & Donaghmede Station with regards to lift performance and difficulties for people with disabilities, limited mobility, wheelchair users, baby buggies where lifts are needed.

The submission highlights historical concerns about anti-social behaviour, public safety and security risks around Howth Junction. It claims that the approach road to Howth Junction is “extremely isolated”. It emphasises that provision of additional lighting, CCTV and new stairwells will not eliminate these problems.

Response to Issue Raised

Refer to:

- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station and
- Section 2.2.8 - Improvement to Station Amenities (accessibility, public realm).

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses in Baldoyle, Sutton and Howth. It claims that businesses will have to “grapple with delays” to their deliveries and longer journey times for staff and customers.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6.2.76 SB0099 – Lys Hegarty, Neil Hayes, Andrew Mollard, Jayne Mollard

Representative: n/a

Submission Location – Howth/Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns over a perceived downgrade in service related to the proposed introduction of a shuttle service by DART+ Coastal North. The submission also notes particular concern for tourist and commuting students now being required to interchange between rail services. It also raises concerns over train capacity and seat availability.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable,
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers, particularly those using the station during nighttime hours.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road and the Sutton.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas. It also claims the lack of direct services will most likely encourage people to use private vehicles.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry, as Howth is a major tourist destination in the Dublin region.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission raises concerns about the facilities at Howth Junction, describing the station to be “quite unpleasant” in, especially at night.

Response to Issue Raised

Refer to:

- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station and
- Section 2.2.8 - Improvement to Station Amenities (accessibility, public realm).

7. Summary of Issue Raised

The submissions claims that the Proposed Development treats the people of Howth as inferior to those who live along the Northern Rail corridor.

Response to Issue Raised

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

6.2.77 SB0101 – Margaret Kelly

Representative: n/a

Submission Location – Baldoye (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission objects to the Proposed Developments impacts on the direct service to Howth and notes that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It emphasises that this will lead to increased air pollution and have overall negative impact on the environment.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.2.14 - Air Quality/Dust and
- Section 2.2.16 - Health Concerns.

2. Summary of Issue Raised

The submission raises concerns about increased journey times due to the need to change trains at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

3. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas. It raises concerns over train capacity on services arriving from the North and overcrowding during peak hours.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

5. Summary of Issue Raised

The submission refers to building developments in Howth and the future growth of the Howth Population.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry, employment and overall local economy of Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6.2.78 SB0102 – Marian Smyth

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The Observer acknowledges the need for the Project and the proposed extension of DART services to Drogheda.

The submission claims that the Project proposals should not result in a loss of direct services to Howth which will cause further delays and result in an increase of travel times for all passengers between Howth and the city centre.

The submission notes that the loss of direct services will push commuters back to private car usage.

The submission notes a lack of clarity on when the shuttle may operate and when direct DART services will be available.

Concerns are raised in relation to delays associated with revised timetables.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station,
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity and
- Section 2.2.20 - Issues with previous timetable changes.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It claims that this will have a negative impact on the wider road network, bus services, emergency services operation and increase air pollution in the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and parents with young children.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses, tourism and cultural heritage.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism and
- Chapter 20 of the EIAR for assessments of Archaeology and Cultural Heritage.

5. Summary of Issue Raised

The submission claims that the increase in population, and planned new apartment building in Howth, coincides with a reduction in services provided to residents of Howth and the surrounding areas. The population increase is considered likely to negatively impact on traffic disruption with increased level crossing closure times and frequency.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

6. Summary of Issue Raised

The submission proposes enhancements to the signaling system between Howth and Howth Junction to improve traffic flow.

Response to Issue Raised

Refer to Section 2.3.1.4 - Improvements/ Optimisation of Level Crossings.

7. Summary of Issue Raised

This submission calls for Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.79 SB0103 – Mary Clarke

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes its agreement with the DART+ Coastal North objectives to extend DART services to Drogheda, it claims objection to the loss of direct services to Howth which will result in an increase in travel times for all passengers between Howth and the city centre. It also raises concerns over trains capacity of receiving trains and overcrowding during rush hours

Response to Issue Raised

The Applicant acknowledges the Observers support for the principles of the DART+ Coastal North Project.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and wheelchair users.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It also raises concerns about the lack of adequate security measures at the station, which poses a risk to commuting passengers, including school children and the elderly.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission indicates that the Proposed Development would worsen the existing traffic congestion caused by the level crossing barrier closing times. It emphasises that this could negatively impact emergency services and restrict access to residential properties.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry and local businesses and the economy of Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission raises concern for those residents relying on Claremont Level Crossing for access, and the reduced levels of access they will have going forwards.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

7. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

8. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, over three quarters of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

9. Summary of Issue Raised

The submissions claims that the consultation process was not transparent or fair. The submission notes that the positives of DART+ coastal North were presented at the public consultation events and the negative impacts such as the loss of the direct service to Howth, which was the core objection, was glossed over.

Response to Issue Raised

The Applicant in no way intends for any information contained in the Railway Order Application to be considered misleading or non-transparent.

CIÉ is bound by legal requirements in relation to the documents contained in the Railway Order application. This included a Non-Technical Summary of the EIAR. In order to ensure all stakeholders understood the proposals and were given a fair opportunity to submit their views during the statutory, and non-statutory, consultation, the following supports were available:

- Project web page updated with plain English responses to Frequently Asked Questions
- Project information telephone line and email, for any member of the public to raise queries with the Project team and discuss their individual needs and concerns. Plain English was used both on the phone line and in meetings with the public and property owners / occupiers.
- Members of the Project team were available to meet with affected landowners / occupiers, virtually or at their property through the Project development.
- Members of the Project team were available to meet with any members of the public during the statutory consultation period.

Throughout the statutory, and non-statutory, public consultation phases the Project Team was available and active in assisting people via the Project phone line and email service.

Further clarification on points raised frequently as part of the Statutory Consultation phase have been included as part of the response document to provide further information.

Refer to:

- Appendix A3.1 & A3.2 from the EIAR (PC1 and PC2 Findings Reports),
- Section 2.2.5 - Insufficient communications and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account

10. Summary of Issue Raised

The submission calls for an Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.80 SB0106 – Maura Murtagh

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes its objection to the proposed introduction of a shuttle service on the Howth Branch and notes that the proposed four tracking project between Connolly and Malahide negates the need to remove direct DART services from Howth.

The submission raises concerns about the decline in services. It emphasises that there is "zero confidence" in Irish Rail's ability to continue providing a frequent and reliable service for commuters in Howth, Sutton, and Bayside with the current track conditions, as demonstrated by the recent issues with timetables implemented.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.2.20 - Issues with previous timetable changes

The Applicant would like to clarify that the introduction of a four-tracking solution between Connolly and Malahide is not yet a confirmed project and remains in the feasibility phase.

Refer to Section 2.2.21 - Long-term Planning in public transport strategies and land use planning.

2. Summary of Issue Raised

The submission asserts that the Proposed Development fails to consider the anticipated population growth in the area. It emphasises that feasibility studies do not account for the increase in commuter numbers.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It notes that it could negatively affect road network and increase CO2 emissions from the road traffic in the area.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission raises safety concerns for commuters due to the need to transfer at Howth Junction. It also claims that there are limited alternative options for passengers traveling, especially during the nighttime.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises concerns about Irish Rail's lack of engagement with the local community and marginalisation of Howth/Sutton/Bayside corridor residents. It is felt that the needs of commuters along the Northern Line are being prioritised over the needs of those along the Howth Branch. The submission claims that the people of the Howth Peninsula “*do not feel supported by Irish Rail as an existing community*”.

Response to Issue Raised

Irish Rail would like to reaffirm its dedication to providing rail services to all communities across its network.

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

6.2.81 SB0107 – McHale Family

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission objects to removal of Howth direct DART service and its replacement by shuttle service.

Response to Issue Raised

Refer to Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission questions why current signalling and train management technology are not being considered as a better option instead of removing the direct service.

Response to Issue Raised

Implementing new signalling on the Howth Branch or on the mainline will not enable an increase in capacity that would allow a direct service to Howth to be maintained with the proposed future frequency of trains on the Howth Junction - Malahide section. The limiting conditions are the crossing movements required for trains routed towards Howth and trains from the Howth branch attempting to merge with the traffic coming from the Malahide direction. These movements place a major constraint on the number of trains that can pass through Howth Junction and maintaining these movements would prevent achievement of the ultimate Train Service Schedule.

The CCRP project completed up to 2010 renewed the signalling in the Howth branch and Howth Junction sections with the objective of maximising throughput while at the same time minimising the impact of the service on other trains and level crossings. The design by necessity prioritises unimpeded train movement - maximising speed through the area to minimise the time barriers are down. Operationally, the conditions to initiate level crossing closures and to minimise the impact on Level Crossing users were carefully reviewed. The design was improved where possible to reduce impact within the constraints imposed by the

train performance. These constraints are fundamentally unchanged since the time the design was completed. Based on this, there is no feasible improvement to the signalling design that can mitigate the capacity impact of the Howth Junction crossing or level crossings closure time.

4. Summary of Issue Raised

The submission raises health and safety concerns for school children, elderly and people with disabilities around need to transfer and change platforms at Howth Junction.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises concerns about the negative effects of the Proposed Development on tourism. It points out that the changes will impact the number of visitors to the area, which the local economy depends on.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission asserts that the Project team failed to address the concerns raised and demonstrated an unwillingness to consider the proposed alternatives.

Response to Issue Raised

Refer to:

- Section 2.3.1.16 - Need to look at alternatives and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

7. Summary of Issue Raised

The submission requests Oral Hearing if the existing Howth Direct DART service is removed.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.82 SB0109 – Melinda and Eamonn O’Brien

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the negative impact the Proposed Development will have on the existing DART users along the Howth Branch line, particularly on elderly and people with disabilities. Objection to the removal of direct services to Howth are raised.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

2. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission raises concerns about the lack of direct services and how it contradicts the Project's goal of encouraging people to use public transport.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission highlights traffic and environmental concerns stemming from the Proposed Development. It points to potential public transport delays, increased emissions, and additional obstacles for pedestrians and cyclists.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

5. Summary of Issue Raised

The submission indicates that the Proposed Development would further worsen the existing traffic congestion caused by the level crossing barrier closing times. It emphasises that this could lead to delays affecting local school students and increased congestion on weekends, particularly around Sutton Cross and the Hill of Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

6. Summary of Issue Raised

The submission asserts that the Proposed Development fails to consider the anticipated population growth in the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

7. Summary of Issue Raised

The submission also raises concerns about train frequency and how it is going to affect future passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
 - The people of Howth require clarity.

8. Summary of Issue Raised

The submission highlights historical concerns about security and anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

9. Summary of Issue Raised

This submission requests Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.83 SB0110 – Melissa Curtis

Representative: n/a

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about the loss of direct service to Howth and its impact on vulnerable groups, including students and the elderly, who may no longer be able to travel efficiently and safely.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

2. Summary of Issue Raised

The submission raises concerns about worsening traffic congestion due to active population growth, particularly in newly developed areas.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. It notes that removing direct services is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission claims that the proposed plan will have a negative impact on the existing planning and development of the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses. The loss of direct services would lead to further delivery delays and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

7. Summary of Issue Raised

The submission claims that the Proposed Development could pose a risk to public safety by delaying emergency responses in the area.

Response to Issue Raised

Refer to Section 2.3.1.7 - Impact on Emergency services.

8. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

9. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

10. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry. It notes that the proposed plan might result in overcrowding on trains, with very few bus services and deter tourists from visiting the area.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

11. Summary of Issue Raised

The submission claims that the services to Bayside, Sutton and Howth should not have to suffer greatly to increase service to Drogheda.

Response to Issue Raised

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

12. Summary of Issue Raised

The submission requests an Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.84 SB0111 – Management Committee of Members of Sutton Golf Club

Representative: O'Neill Town Planning

Submission Location – Howth Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that Sutton Golf Club believes the Railway Order application is premature due to proposed operating regime options for the Howth Junction & Donaghmede to Howth line.

Response to Issue Raised

The DART+ Coastal North project proposals will result in a greatly enhanced level of service on both the Northern Line and Howth Branch. The primary objective of the DART+ Coastal North project is to deliver the infrastructure required to enable this. As detailed within the Railway Order application, (see in particular Chapter 4 Description of the Proposed Development in the EIAR), the DART+ Coastal North project will, if consent is granted, “*deliver an improved and extended electrified rail network and will enable increased passenger capacity and an enhanced train service between Dublin City Centre and Drogheda, including the Howth Branch.*”

The Applicant has been clear throughout the non-statutory public consultation process and in the application documentation that while the proposed development seeks to make the infrastructural changes which would enable these operational changes, the implementation of these operational changes is not part of the DART+ Coastal North project.

It is important to note that the planned level of service increase from 3 trains per hour to 6 trains per hour during peak periods is not something that would come into effect immediately

upon the delivery of the DART+ Coastal North project. Following completion of the project, there will be different phases of timetable development that will be gradually introduced as the passenger demand grows towards the maximum level of service. It is also envisaged that shuttle services would operate at peak times with direct services being maintained at off-peak and weekends.

Once DART+ Coastal North is complete (if consented) and as demand increases, the operational detail will be worked through, with these operational changes likely made on a phased basis.

Any substantial timetable change will go through a Public Consultation process of its own organised by the National Transport Authority (NTA) known as the Timetable Customer Consultation Process.

The Applicant also notes that full details of the proposed development are provided in the Railway Order application, and the associated EIAR, NIS and accompanying drawings.

2. Summary of Issue Raised

The submission raises concern about underestimated crossing closure times. It claims that Iarnród Éireann's figures underestimate current time delays due to barrier closures at Cosh Level Crossing. It also noted that forecasted closure times are also underestimated based on these figures.

Response to Issue Raised

Cosh Crossing (915) carries Lauder's Lane over the railway line, connecting one side of the Sutton Golf Club to the other.

No infrastructural changes are proposed in this location. However, the DART+ Coastal North project, through infrastructural changes at Howth Junction & Donaghmede Station and elsewhere on the DART network, is enabling an increase in the frequency of service along the Howth Branch, from 3 trains per hour to 6 trains per hour, during peak periods.

This increased level of service will increase the frequency and duration of the level crossing closures along the Howth Branch, including at Cosh level crossing. The Applicant acknowledges that this will have an impact on the Sutton Golf Club members as a result.

Prior to addressing the specific issue raised, the Applicant refers to the response under Section 2.3.1.4 herein which describes how the level crossings on the Howth Branch operate and the specific constraints/sensitivities associated with their operation. This is useful context and highlights the sensitivity of the level crossing closures to the exact meeting point of trains along the railway line.

It is also useful to refer to Appendix A6.1 DART+ Coastal North Level Crossing Assessment, in Volume 4 of the EIAR, which, in Section 3.2 of that document, sets out the modelling parameters used to assess the level crossing closures on the Howth Branch. This details how

“the modelling assumes that all level crossings are automatic and require safe closure before the signals can be set for the approaching train. Between barrier closures, the road will need to be open for a minimum of 20 seconds, otherwise the barriers will remain down, and the crossing closed. The crossing is assumed to begin to open once the train passes a clearance point, assumed to be 10m from the level crossing, and the barriers are assumed to take 8 seconds to open.”

The Applicant notes that the reference to the road being open for a minimum of 20 seconds above, is to ensure that there is adequate time for vehicles to cross the level crossing while it is open. The Commission for Railway Regulation’s guidelines state that barriers should remain closed if the opening time would be less than nine seconds.

1. Modelling Parameters

Section 3.2 of Appendix A6.1 of the EIAR details how:

“Following discussions with IÉ with respect to the signal operations and an analysis of level crossing closure times based on control centre data collected between January 12-14, and May 1-9, 2022, it emerged that there are currently significant variations in the duration of the level crossing closure times. These are mostly due to the following three reasons:

- The timetable structure*
- Operational variance caused by train delays and different driver behaviours*
- Human interference in the signalling system by the signaller.*

To create a common baseline for comparison, Arup developed four Howth Branch line timetable variants in the RailSys software. The modelled closure times are based on the average value between the 5th and 95th percentile of all observed closure times and are centred around the time when the trains pass each level crossing. The level crossing closure data was calculated based on control centre data received from IÉ.”

Section 3.2 then goes on to describe how:

“Modelling has been undertaken with three objectives:

- To calibrate and validate the closure behaviour of the existing 3TPH Working Timetable, to use as a baseline assumption for future scenarios*
- To examine the impact of an increase in train frequency for 4, 5 and 6 TPH*
- To examine the sensitivity of level crossing closure times dependent on the timetable structure and/or performance of the 6 TPH TSS1C timetable*

Modelling covers the following 14 service variations per direction:

- 3 TPH (Reflects Working Timetable – i.e. the baseline scenario);
- 4 TPH (regular intervals);
- 5 TPH (regular intervals);
- 6 TPH (regular intervals, reflects TSS 1C);
- 6 TPH with 1-minute offset;
- 6TPH with 2-minute offset;
- 6TPH with 3-minute offset;
- 6TPH with 4-minute offset;
- 6TPH with 5-minute offset;
- 6TPH with 6-minute offset;
- 6TPH with 7-minute offset;
- 6TPH with 8-minute offset;
- 6TPH with 9-minute offset; and
- 6TPH with 10-minute offset.

All offset scenarios are based on the 6 TPH TSS1C, with all down direction trains offset by a period of time. Since TSS1C is not necessarily the timetable to which trains will operate following implementation of the DART+ Programme, this serves as a sensitivity check to evaluate how differently the level crossings will behave if services are more, or less, synchronized.”

The Applicant (as part of the EIAR) and as detailed in Section 3.3 of Appendix A6-1 therein, modelled, in RailSys, the level crossing opening/closure times for the entire Howth Branch line for the 14 different service variations listed above. As detailed above, this serves as a sensitivity check to evaluate how differently the level crossings will behave if services are more, or less, synchronised.

As detailed in Section 3.3 of Appendix A6-1 “TSS1C is the main service scenario, assuming trains will leave every 10 minutes, with services departing from Howth Junction & Donaghmede Station and services departing Howth Station separated by ten minutes.”

2. Barrier results

As detailed above, the level crossing closures are highly sensitive to the exact meeting point of trains in any given scenario; having trains cross simultaneously is the best case, as it allows two trains to pass for one closure. By contrast, the worst scenario would be two trains separated by 20 seconds or less, meaning that the level crossing will be held down for the maximum amount of time.

As detailed in Section 3.3 of Appendix A6-1, to “test the effect of differing meeting points - stemming from different service patterns - scenarios offsetting the departure time of down trains by 1 to 10 minutes were run. Since the level crossing closure times depend on the relative meeting point between down and up services, it is only necessary to offset trains in one direction. Offsets were continued up to + 10min, at which point a regular 6 TPH per direction service like the Howth Branch line will bring the timetable back to its starting point.”

“The results in the table below show that opening numbers increase and decrease but are not detrimentally impacted by a changing timetable or timetable performance. Intuitively, the fewer trains being run per hour, the longer the barriers will be open.”

The table referenced in the paragraph above is Table 3.1 from Appendix A6-1 of the EIAR, which is reproduced below for ease of reference:

Table 3.1 Level Crossing Open Time Results – range of open time and total open time in any given hour for 6 TPH and 10 different timetable structures

	Claremont (913)	Cosh (915)	Sutton (916)	Kilbarrack (917) (Baldoyle Road)
TSS1c	6 - 12 Openings (02:22 to 07:09) Sum: 28:26 to 42:52	6 - 12 Openings (02:26 to 07:00) Sum: 29:13 to 42:02	6 - 12 Openings (02:18 to 07:49) Sum: 27:41 to 46:54	6 - 12 Openings (02:27 to 07:52) Sum: 29:10 to 47:10
3 TPH per direction (WTT)	5 Openings (02:23 to 12:21) Sum: 42:36	3 Openings (01:43 to 17:47) Sum: 46:12	3 Openings (04:39 to 17:07) Sum: 48:39	5 Openings (00:37 to 15:25) Sum: 44:24

As detailed above for the TSS1c scenario (i.e. 6 trains per hour per direction), the Cosh level crossing would be open between 6 and 12 times within the hour, for a duration of between 02 minutes 26 sec and 07 minutes, with a total open time of between 29 minutes and 13 seconds and 42 minutes and 2 seconds.

The Applicant notes that, at other times, when train frequency is below the maximum 6 trains per hour, the level crossing closure frequency and closure durations may reduce.

The Applicant also tested the impact of an increase in train frequency from 3 trains per hour per direction (TPHPD) to 4 and 5 TPHPD, so as to assess the impact of increasing frequency (but below the maximum TSS1c frequency). To do this, as detailed in Section 3.3 of Appendix A6-1, ‘estimates for the average sum of minutes of open time have been calculated for each respective frequency on a clockface pattern. The values presented below are subject to

change with a change of departure time. The model results for these can be observed in the table. These have only been modelled to test the sensitivity of increasing train frequencies. Therefore, no transport assessment has been undertaken for these options. Note that in each respective timetable, trains in each direction start on the hour in these instances’.

Again, for ease of reference, the Applicant has reproduced the table referenced above (Table 3.2 in Appendix A6-1) below:

Table 3.2 Level Crossing Open Time Results – range of open time and total open time in any given hour for 4 and 5 TPH – not included in the vehicle impact assessment

	Claremont (913)	Cosh (915)	Sutton (916)	Kilbarrack (917) (Baldoyle Road)
5 TPH per direction	10 Openings Average: 03:22 Sum: 33:40	5 Openings Average: 07:00 Sum: 35:00	5 Openings Average: 09:49 Sum: 49:05	5 Openings Average: 07:10 Sum: 35:50
4 TPH per direction	8 Openings Average: 04:52 Sum: 44:24	4 -Openings Average: 10:00 Sum: 40:00	4 Openings Average: 12:49 Sum: 51:16	4 Openings Average: 10:10 Sum: 40:40

This indicates that for 4 TPHPD, the Cosh level crossing will be open 4 times per hour, for an average open duration of 10 minutes and an overall open duration within the hour of 40 minutes. For 5 TPHPD, the level crossing will be open 5 times per hour for an average open duration of 7 minutes and a total open duration of 35 minutes.

From the above, it is clear that level crossing closures at Cosh will increase from approximately 3 times per hour to between 6 and 12 times per hour, depending on the future operational timetable.

As detailed in Section 6 of Appendix A6-1, the duration of these closures may also increase to varying degrees, depending on the operational timetable. An averaged closure time was assessed for the purposes of the analyses, but fluctuations in the timetable were addressed as part of a sensitivity analysis as described in Section 4.6 of Appendix A6-1. This sensitivity analysis was done by inputting the barrier results from the 6TPHPD 1 to 9 minute offset outlined both in Section 3 of Appendix A6-1 (and listed above). It is noted that the 10-minute offset is the same as a regular timetable.

Table 4.29 in Appendix A6-1 summarises the results for Cosh level crossing in this regard.

It is important to note that the future operational timetable will be developed over time, as demand increases. However, to assess a reasonable worst case, we have looked at the scenario where we have the full 6 trains per hour (e.g. during peak periods).

To create a baseline for comparison, the 3TPH Working Timetable was used in which the trains cross each other at similar times through Cosh crossing and the barrier is closed 3 times

per hour, for between approximately 2 and 5 minutes each time. This amounts on average to c. 20% of the time.

Table 4.29 Comparison of Level Crossing Closure Times – Cosh (915)

Location	Number of Closures per hour	Total closure time per hour	Minimum single closure time	Maximum single closure time	Assessed Timetable
Baseline Cosh (915) Level Crossing	3	00:11:13	00:02:16	00:05:13	00:03:44
Proposed Cosh (915) Level Crossing	6 or 12	00:17:58 to 00:30:03	00:02:30	00:05:01	00:05:01 6 times per hour

When, in the future, the demand increases and the full-service enhancement delivered by DART+ Coastal North is realised, (i.e. 6 trains per hour during peak periods), the level crossing closure frequency will increase beyond this. The number of closures is likely to be 12 times per hour as it is assumed that the future operational timetables will prioritise having minimal impact on the most critical level crossing between Howth Junction and Howth.

Again, depending on the future operational timetable the closure durations will also likely increase from the current closure time of between approximately 2 and 5 minutes. This equates to the level crossing being closed for up to a maximum of 50% of the time, during peak periods.

The Applicant notes that, at other times, when train frequency is below the maximum 6 trains per hour, the level crossing closure frequency and durations would reduce.

3. Surveys

Traffic surveys were carried out at the junctions either side of the Sutton and Kilbarrack level crossings on Thursday 11 May 2023. Traffic surveys were carried out all four level crossings along the Howth branch Thursday 11 May 2023 to Wednesday 17 May 2023. The seven-day data confirmed that Thursday 11 May 2023 is a normal representative neutral day, suitable for assessments purposes, in line with the relevant guidance⁹.

In terms of traffic at this level crossing, the surveys carried out as part of the EIAR, which were done in accordance with best practice and guidance (see Section 6.3 of Chapter 6 Traffic & Transportation in the EIAR), show that the volume of vehicles crossing Cosh (915) Level Crossing is relatively low. Surveys have shown only 23 vehicles travelling northbound and 25 travelling southbound across the rail line between 08:00 and 09:00; and 48 northbound and 24 southbound between 17:30 and 18:30.

⁹ Project Appraisal Guidelines Unit 5.2 - Data Collection , PE-PAG-02016 December 2023 Transport Infrastructure Ireland

In terms of pedestrians, surveys have shown 510 pedestrians crossing the level crossing between 06:00 and 20:00.

Therefore, while the likelihood of vehicles incurring delay will increase in the future due to the increased train frequency, it is not expected to have a significant impact in terms of queuing/waiting, due to the low volumes of vehicles.

Similarly, the likelihood for pedestrians / golf members to incur delay at a level crossing will increase. However, the wait time for pedestrians / golf members at these closures is expected to continue to be similar to that experienced today.

The Applicant would also note that while the proposed Cosh level crossing closure frequency and duration will increase, it will remain in line with, and below, existing current level crossing closure durations and frequencies in other parts of the DART and rail network (Section 4-8 in Appendix A6.1 of the EIAR).

3. Summary of Issue Raised

The submission raises concerns about the potential negative impact of the proposed changes on local business and local activities:

- The underestimated closure times pose an existential threat to Sutton Golf Club and the leisure activity of golf.
- The application does not account for the realistic impact of forecasted closure times on the club.
- The application lacks consideration of the effects on activities near the Howth Junction to Howth railway line.

Response to Issue Raised

Cosh Crossing (915) carries Lauder's Lane over the railway line, connecting one side of the Sutton Golf Club to the other. The 9-hole course is spread over both sides of the DART line with three holes to the south. Golfers therefore need to use the level crossing to cross from one side to the other.

Barrier closure times and modelling are addressed in our response to item 2 above.

Chapter 7 Population in the EIAR assesses the potential effects of the proposed development on population and in this regard, has considered the potential effects on the golf club. As detailed in Section 7.5.4.2 therein *"Extended delays are inconvenient and can allow the next group of players to catch up with the previous group. The modelling indicates a negative impact due to an increase in the frequency of delays. Although wait times will continue to be short at between 2 to 5 minutes, a moderate negative impact on the amenity of golfers can be expected due to the effect of additional delay to the transition between groups of players."*

The Applicant acknowledges that this will have an impact on the Sutton Club members as a result.

4. Summary of Issue Raised

The submission claims that the proposed plan lacks consultation. It notes that the Applicant did not adequately consult those affected by the Railway Order application, particularly Sutton Golf Club.

Response to Issue Raised

The Applicant has sought to engage fully with stakeholders, impacted landowners, and members of the public through the development of DART+ Coastal North. please refer to our response under Section 2.2.5 - Insufficient communications for further information.

Members of the Project Team met with representatives of Sutton Golf Club at the Golf Club on 13th February 2023 and discussed the DART+ Coastal North proposals and the concerns of the Golf Club at length. Feedback from this meeting, and feedback received as part of the non-statutory consultations was fully considered by the Applicant and the Project Team in the design development.

5. Summary of Issue Raised

The submission claims that enterprises which have been split by railways permanent way have successfully defended their rights where attempts have been made to curtail those rights by the operators of trains running on the permanent way and reference is made, in particular, to the decision of the High Court in *Kavanagh v. CIÉ* [2009] IEHC 624.

Response to Issue Raised

In *Kavanagh v. CIÉ* [2009] IEHC 624, the plaintiffs asserted that they had the benefit of an accommodation way by virtue of Section 68 of the Railway Clauses Consolidation Act, 1845 ("the 1845 Act"). The court was ultimately concerned in the case with the physical condition of the level crossing and directed that the level crossing be upgraded to a state which would accommodate the type of traffic permitted. The Court, however, saw no basis for holding that there was an obligation on the defendant to bring the Level Crossing into line with other level crossings such as the level crossing at Sidney Parade Avenue in Dublin 4.

The case was not concerned with the *operation* of the level crossing or the frequency of opening and closing times. It is therefore submitted that the case has no relevance to the issues raised by this landowner.

6. Summary of Issue Raised

The submission proposes an underground tunnel linking the two parcels of land as an alternative solution to maintain accessibility without hindering golfers.

Response to Issue Raised

Whilst is acknowledged that the proposed increased level crossing closure frequency and duration will increase, the assessment of impacts on vehicles, cyclists and pedestrians

(including golfers) concluded the level crossings will continue to provide adequate levels of service. Hence, there was no requirement for intervention at the level crossing and for that reason, consideration was not given to a tunnel option.

6.2.85 SB0112 – Michael and Pamela Hillard

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes objection to the removal of direct services to Howth and claims that the transfer requirement will create serious inconvenience for all passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission raises safety concerns as Howth Junction is known for passenger safety and security issues, with no improvements expected under the new plan. It notes that the station is in an industrial estate, making it bleak, cold, isolated, and frightening, especially at night.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, elderly and parents with young children due to overcrowding, limited seat availability on the trains and unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission proposes following alternatives:

- Irish Rail plans to add four tracks between Connolly Station and Malahide Station to separate commuter and intercity services, which could be a viable alternative to removing direct services.
- Infrastructure Priority: Increasing infrastructure capacity by adding new lines should be prioritized over reducing existing services.

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

6.2.86 SB0113 – Michelle McGrath, Colum Crowley

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the direct DART services are vital for communities in Howth, Sutton, and Bayside. The lack of direct services will have negative impact on daily lives of residents due to increased journey times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics

2. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and wheelchair users due to unreliable lifts at Howth Junction.

Issues such as increased journey times associated with interchanging at Howth Junction & Donaghmede are cited.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. In contrary, loss of direct services may lead to increased car usage. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. This will have negative impact on wider road network, including buses and emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses in Baldoyle, Sutton, and Howth. The proposed changes might result in delays in deliveries and longer journey times for staff and customers. It also notes that the lack of direct services might discourage tourists, resulting in lost revenue for local businesses.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6.2.87 SB0114 – Monica Lambert

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the proposal is “vague” and lacks specific information, with no demonstrated immediate need. It notes that the proposal seems to grant too much discretion to the Applicant, which is not in line with good planning practices.

Response to Issue Raised

Refer to:

- Section 2.2.1 - Principle of development,
- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated - The people of Howth require clarity and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account

2. Summary of Issue Raised

The submission claims that the consultation process appears to have been inadequate, with significant details like the addition of two new lines omitted.

Response to Issue Raised

The Applicant clarifies that relevant information has not been omitted as part of the Railway Order application. The additional two lines to which the submission refers are understood to be part of the 'Four North' project which is proceeding separately to the DART+ Coastal North Project and remains in the options & feasibility phase.

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning,
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account and
- Section 2.2.5 - Insufficient communications.

3. Summary of Issue Raised

The submission claims that the proposed changes could disproportionately affect commuters, including the elderly, families, schoolchildren, and workers.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

4. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses and tourism industry.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

5. Summary of Issue Raised

The submission raises concerns about safety, security, and the lack of facilities at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6.2.88 SB0116 – Nashville Residents Alliance

Representative: John Beckett

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes that there is unprecedented population growth in apartment numbers, including overdevelopment of the Techrete site, Howth Castle, Santa Sabina and Baily Court in Howth Village. It claims that it is illogical to downgrade the vital DART service in this context, particularly when there is a lack of road space.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects vulnerable transport service users due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that there is a material risk to wellbeing and safety of passengers. The

submission also notes that the proposal is insufficient to address the station's long-standing issues with significant antisocial and criminal activity.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It raises concerns that traffic could regularly back up through Sutton Cross during closures at the Station Road crossing. Furthermore, it emphasizes that residents of Howth Lodge would be heavily impacted as they have no alternative access to their homes.

The inconvenience using public transport could result in forcing people to switch to private vehicles, leading to extremely high traffic levels, increased air pollution, and higher carbon emissions.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road.

5. Summary of Issue Raised

The submission raises concerns about access of emergency services in the area.

Response to Issue Raised

Refer to Section 2.3.1.7 - Impact on Emergency services.

6.2.89 SB0118 – Niall Murray

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that rapid growth of apartments in the area will significantly increase pressure on public transport and a reduction in service is not sensible.

Response to Issue Raised

Refer to:

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry. It notes that over 1.5million people visit Howth annually and this will dramatically damage the local economy.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers. The submission notes that Howth Junction is situated in the middle of a poorly lit and serviced industrial estate. Furthermore, it mentions that forcing children to change at unsafe areas or stations poses a significant risk to their safety.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It notes that the station is not accessible for prams or people with disabilities.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission claims that the loss of direct services will have a negative impact on local property prices. It also notes that this will force people back into cars, negatively affecting the environment and contradicting the government's climate change goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

It is also noted that Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

7. Summary of Issue Raised

The submission claims that the removal of a vital amenity and awarding to another line is discriminatory toward the Howth Line users.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

8. Summary of Issue Raised

The submission claims that the loss of a direct train will increase the need for road-based commuting, with a knock-on effect of increasing related road maintenance, accidents and time lost due to traffic delays which can cost both the public sector and individuals.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

6.2.90 SB0119 – Noel Mannion, Anne O’Gara

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the increased number of residential units, currently under construction and in the planning stages, will lead to a significant population increase on the Howth peninsula. It emphasises that this will require fast and efficient train and bus services.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals. It also notes that this will lead to serious congestion on the single road coming off the peninsula.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

3. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry. It emphasises that Howth is popular tourist destination with many people taking day trips.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and wheelchair users due to overcrowding, limited seat availability on the trains and unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are. The submission also notes that this might lead to severely disrupt traffic on the wider road network, including buses and cars.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses in Sutton and Howth. It notes that businesses will have to grapple with delays

to their deliveries and loss of customers due to traffic congestion and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6.2.91 SB0120 – Norbert and Margaret Bannon

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the loss of direct services raises safety concerns and that the current proposals present the following issues:

- Pose a real threat to the safety and welfare of children who use the service to access their schools.
- Real threat to the safety and welfare of the vulnerable and old in the affected communities.
- Provoke residents to use their cars, that is being contrary to government policy for sustainable transport.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times, particularly at Sutton Cross.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission notes that the proposals will result in a negative impact on property value in the areas surrounding the Howth Branch Line. The potential for the Project to diminish the value of residential and business properties in the area affected by discontinuing a service is raised.

Response to Issue Raised

Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

4. Summary of Issue Raised

The submission proposes that two direct trains per hour should be retained as a minimum.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

6.2.92 SB0121 – Norman and Angela Fullam

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission welcomes any positive developments to the rail system. However, the observer objects to the loss of direct services to Howth and the perceived downgrading of the DART service between Howth and Dublin City Centre.

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

The Applicant welcomes the support of the DART+ Coastal North Project, and acknowledges the associated concerns raised.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission raises concerns about overcrowding and seat availability on Howth branch.

Response to Issue Raised

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that the recent Irish Rail timetable change is instructive.

It also notes that the issues lie with track access and platform availability at Connolly Station, not with the Howth branch line.

Response to Issue Raised

While the Applicant acknowledges the feedback included in this submission in relation to issues at Connolly Station which are addressed by DART+ West, the need for the current DART+ Coastal North proposals are required to allow the Project to deliver the necessary infrastructure to meet the requirements of TSS1C.

Refer to Section 2.2.20 - Issues with previous timetable changes and the steps which are being taken to address these issues.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities due to the lack of toilets and escalators.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and

- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

It notes that this could negatively affect operation of emergency services in the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

6. Summary of Issue Raised

The submission claims that the future increase in the population of Howth coincides with a reduction in services provided to residents of Howth and the surrounding areas. The submission queries whether the Multi-Storey residential developments have been accounted for in the EIAR assessments.

It notes that this can encourage more people using private vehicles rather than rail services, contrary to sustainable travel goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station,
- Section 2.3.1.15 - Concern around increased population in Howth and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

7. Summary of Issue Raised

The submission claims that many people from Dublin and beyond come to visit. It notes that the proposal to downgrade the direct rail link will limit access for many, with a consequent adverse effect on physical and mental health. The impact on the tourism industry is also noted.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

8. Summary of Issue Raised

The submission raises concern relating to survey data associated with traffic flows across the level crossings.

The submission notes that the estimated closure time of the level crossing is based on all DART services running to schedule which is perceived as rarely happening.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

9. Summary of Issue Raised

The submission claims that it is worrying that the study of the requirements to deliver a four-track section is only now being undertaken.

Response to Issue Raised

Refer to Section 2.2.21 - Long-term Planning in public transport strategies and land use planning.

6.2.93 SB0125 – Old Castle Residents' Association

Representative: Norma O'Mahoney

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission objects to the proposal to introduce a shuttle service on the Howth Branch and result in the removal of some direct services between Howth and Dublin City Centre.

The Submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It raises concerns that this could affect emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

2. Summary of Issue Raised

The submission suggests that increased congestion in Sutton will make public transport inaccessible for those needing to reach Sutton station.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission claims that the loss of direct services will result in increased travel times for all passengers traveling between Howth and the city centre. It emphasises that this could deter passengers from using public transportation, particularly commuters and tourists.

The submission notes that some commuters will be made suffer for the benefit of others going into the future.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station,
- Section 2.3.1.11 - Impact on Tourism and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and parents with young children due to overcrowding and limited seat availability on the trains stopping over at Howth Junction.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission highlights historical concerns about anti-social behavior around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised

The submission refers to the assessments being made on outdated survey information, which does not include for planned developments on the Howth Peninsula.

Response to Issue Raised

Refer to Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

6.2.94 SB0126 – Orla and Chris Hom

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses and tourism industry.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

2. Summary of Issue Raised

The submission claims that direct DART services are vital for keeping communities connected. It notes that removing these direct services will significantly worsen the already struggling transport system on Howth peninsula.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.15 - Concern around increased population in Howth.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and parents with young children due to overcrowding, limited seat availability on the trains and unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It emphasises that this will lead to increased air pollution due to longer waiting times at level crossings.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission calls for An Bord Pleanála to hold an Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.95 SB0127 – Patrick Leahy

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission claims that the removal of direct service will reduce connectivity of communities.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

3. Summary of Issue Raised

The submission raises concerns that the loss of direct services will encourage people to use private vehicles, which will worsen traffic and lead to increased air and noise pollution. The submission also notes that worsened traffic may reduce road safety and negatively impact cyclists and pedestrians.

The submission claims that Sustainable Transport goals are not supported by the DART+ Coastal North proposals.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and elderly due to unreliable lifts and requirement to change platforms at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission claims that the loss of direct services will result in increased travel times for all passengers between Howth and the city centre. It emphasises that the trains stopping at Howth Junction will be overcrowded. It claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Furthermore, it notes that the existing operation of the services, with constant delays, does not suggest that Irish Rail can deliver the level of service set out in their plan for DART+ in a timely and competent manner.

Response to Issue Raised

The Applicant is confident that, based on the extent of assessment work carried out as part of the DART+ Coastal North Project, there will not be issues with the delivery of the enhanced capacity and frequency of DART Services on the Northern Line to deliver the Train Service Specification TSS1C.

Refer to:

- Section 2.2.1 - Principle of development,
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station,
- Section 2.3.1.15 - Concern around increased population in Howth and
- Section 2.2.20 – Issues with previous timetable changes.

7. Summary of Issue Raised

The submission proposes considering the implementation of a four-track solution at Connolly, which was previously suggested by Irish Rail but not pursued. It suggests that this would be more favorable to users than the removal of the direct Howth line.

Response to Issue Raised

The Applicant appreciates the request to consider alternatives to the introduction of a shuttle service on the Howth Branch. However, this is still seen as the most appropriate solution for the delivery of TSS1C based on current assessments.

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

8. Summary of Issue Raised

The submission raises concerns regarding what the lack of detail of what the proposed shuttle service would be.

Response to Issue Raised

Refer to Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated - The people of Howth require clarity

6.2.96 SB0128 – Paul Burke, Diane Hanrahan

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It notes that this will also have a negative effect on emergency services, disabled people, and workers who need easy motor access.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

2. Summary of Issue Raised

The submission claims that the loss of direct services will result in increased travel times for all passengers between Howth and the city centre. It emphasises that the trains stopping over at Howth Junction will be overcrowded, creating inconvenience for all passengers, particularly for elderly and disabled group.

The submission claims it might encourage people to use private vehicles to drive their cars to the city centre or to Raheny to avoid changeover at Howth Junction.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It notes it will be challenging for vulnerable and disabled users to changing platforms and navigate the station due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission claims that the requirement to transfer at Howth Junction will confuse and deter tourists from visiting Howth peninsula.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission requests that Irish Rail are asked to fix the current speed of the barriers.

As an alternative solution the addition of extra lines are suggested.

Response to Issue Raised

Refer to:

- Section 2.3.1.4 - Improvements/ Optimisation of Level Crossings and
- Section 2.3.1.16 - Need to look at alternatives .

6.2.97 SB0129 – Paul Fitzpatrick, Kevin Fitzpatrick, Paul Jnr Fitzpatrick

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes that a loss of a direct service will be a significant inconvenience for locals and visitors of Howth. The submission raises concerns that the proposal might encourage the use of private vehicles over DART, which could worsen the traffic on the roads and hamper Sustainable Travel goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission highlights historical concerns about anti-social behavior around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses through the observations. It notes that it might deter tourists from visiting the area and result in significant negative impacts.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

4. Summary of Issue Raised

The submission indicates that the potential impact of future residential developments may not have been considered in the proposal.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

5. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It notes this will impact all road users.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

7. Summary of Issue Raised

The submission highlights concerns relating to the six schools on the Howth Peninsula and the potential chaos associated with School Traffic resulting from the DART+ proposals.

Response to Issue Raised

Refer to Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

6.2.98 SB0130 – Paul Lambert

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that there has been a lack of public consultation, calling it “*ill-conceived*” and “*biased*.” It mentions that posters did not indicate where the public could voice their objections and opinions, suggesting that the intention was to reduce their ability to engage with the consultation process. It also felt that the process was advanced with a pre-determined outcome.

Response to Issue Raised

Iarnród Éireann has worked hard to communicate widely and clearly with the general public, throughout the Project development thus far, including two non-statutory public consultation periods, as described in the PC1 and PC2 Findings Report submitted with the Railway Order application. Feedback has been welcomed and appreciated where it has been received.

The information published as part of each public consultation event were developed to set out the Project proposals as clearly as possible. As set out in each public consultation findings report, the Project team sought to reach a wide range of stakeholders and members of the general public to get feedback on the proposals. The feedback received was assessed in detail and has helped shape the development of the Project to date. For example, the proposed upgrades at Howth Junction & Donaghmede Station h are now included as part of DART+ Coastal North are as a direct result of feedback received during PC1. The Applicant refutes the claim that any information presented to date has been “*ill-conceived*” or “*biased*”. The Project has been developed in line with current standards and guidelines.

The claim by the Observer that the Project has progressed with a “*pre-determined outcome*” is also refuted. The main aims and objectives of the Project are to deliver the infrastructure which can maximise service frequency and capacity on the Northern and Howth Branch lines in line with TSS1C, and the proposals included in the RO Application deliver on those aims and objectives. Furthermore, the intent of the Project is to maximise the performance capacity

of existing infrastructure and contain the works to within the extents of the Railway Boundary where possible.

Specific efforts were made to engage with potentially affected landowners and property owners / occupiers along the route. The Project design evolved throughout the early design stage. This meant that additional potentially impacted landowners / occupiers were identified as the project design progressed. IE notified potentially impacted landowners / occupiers as soon as the need for land acquisition at their property was identified.

2. Summary of Issue Raised

The submission claims that Freedom of Information requests revealed that no impact analysis of options, nor a comparative analysis of the adverse and positive impacts on the Howth-City Centre rail line and commuters, was carried out.

Response to Issue Raised

The Applicant can confirm that in the case of the DART+ Coastal North Project all appropriate assessments have been carried out as part of the development of the RO Application. The EIAR sets out the background for the Project, basis for assessments, and the results of all necessary assessments.

It is important to note that the aims and objectives for DART+ Coastal North are to develop the necessary infrastructure to enable the future operation of a maximum level of frequency and capacity as per the Train Service Specification TSS1C. The basis for the project is described further in Section 2.2.1 - Principle of development and within the EIAR itself.

3. Summary of Issue Raised

The submission indicates overall confusion regarding the proposal. It is unclear whether the direct line will be discontinued entirely, only during peak hours, or at specific times on weekdays and weekends.

Response to Issue Raised

The Applicant notes the confusion with regards to future operation of a shuttle service. Currently, and at the time of PC1 and PC2, a future operational timetable has not been developed. The DART+ Coastal North Project is tasked with delivering the infrastructure that will enable the maximum level of service required by the Train Service Specification TSS1C.

Further information relating to the operation of a shuttle service is found in Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated - The people of Howth require clarity

4. Summary of Issue Raised

The submission reports that after the application was filed, new reports have emerged about a proposal to lay two additional tracks into the City Centre (see Appendix 2). This information

is highly relevant and pertinent to the current proposal and should have been disclosed during the consultation stage and referenced in the current application. It undermines the Applicant's stated need to discontinue the Howth-City Centre direct line. It claims that the application, as submitted, is flawed and lacks proper process and disclosure.

Response to Issue Raised

It is important to note that at the current time the progression of any separate projects aiming to deliver additional tracks between Malahide and the City Centre remains at a very early stage. Further information in relation to the development of additional tracks by an Iarnród Éireann project known as the 'Four North Project' can be found in Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and Section 2.3.1.16 - Need to look at alternatives .

This Project does not in any way undermine the proposals of DART+ Coastal North. Should the Project be developed in the future it will further support the infrastructure, frequency and capacity improvements that DART+ Coastal North is seeking to deliver.

Again, it is important to stress, that the operation of a shuttle service on the Howth Branch will be a future operational decision based on demand at the time. The proposed interventions by DART+ Coastal North do not impede the development of the Four-North project should it progress in future.

5. Summary of Issue Raised

The submission refers to a number of media publications within which examples of previous issues with other major projects and timetable changes which the observer notes as undermining confidence in Iarnród Éireann and their ability to deliver projects of the type of DART+ Coastal North effectively.

Response to Issue Raised

Refer to 2.2.20 - Issues with previous timetable changes for further information relating to previous timetable updates.

The Applicant remains confident that future timetable will be developed in an appropriate manner should the need to operate a shuttle on the Howth Branch Line be required.

6.2.99 SB0131 – Paul Tattersall

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission opposes the proposed loss of direct services and notes that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times at Baldoyle Road, Lauders Lane, Sutton Cross and Howth Lodge.

Concerns for school traffic are raised as being thrown into further chaos by the proposals.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

2. Summary of Issue Raised

The submission claims that the increased level crossing closures could delay commuters and encourage them to use the private vehicles instead. This goes against sustainable travel goals and National Policy.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that the backlog will lead to more idling cars, resulting in increased air pollution in the area and negatively affecting human health, especially children's.

Response to Issue Raised

It is important to note that all necessary consideration has been given to this concern during the project development. Refer to 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission argues that the study of commuter activity did not consider the new apartments being built at the Techcrete and Baily Court sites in Howth, as well as the development at the entrance to Howth Castle. It claims that residents of these areas would expect a direct DART service. The submission also argues that the proposed shuttle trains will not be able to accommodate the commuter population.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

5. Summary of Issue Raised

The submission adds that there is a history of antisocial behaviour and incidents at this station. It claims that the proposal subjects passengers transferring at Howth Junction to an increased risk of harm.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. Given the history with out of order lifts, this will pose difficulties for passenger with disabilities, mothers with buggies and elderly to navigate around the station.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

7. Summary of Issue Raised

The submission raises concerns about devaluation of houses purchased based on direct DART services.

Response to Issue Raised

Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-ana-compensation/aa>

8. Summary of Issue Raised

The submission calls for alternative proposal to be considered:

- Decrease the direct service from Howth Station to one train every 30 minutes (currently one every 20 minutes).
- Increase the Northern service through Malahide to one train every 15 minutes.
- Provision of 4 tracking between Malahide and Dublin City.

Response to Issue Raised

It is important to again stress that future timetables for the operation of DART services in the future have not been developed, these will be based on future demand for services. The DART+ Coastal North Project will deliver the infrastructure which will enable the proposed level of increase in service frequency and capacity as it is required in the future.

Refer to:

- Section 2.3.1.16 - Need to look at alternatives and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity.

9. Summary of Issue Raised

The submission claims that “the Irish Rail submission deliberately omitted the large number of tourists using the DART to Howth throughout the year, and also the effect of the 500 new apartments currently being finished beside the station, in order to fraudulently skew the figures in their favour and minimise the disruption of the loss of the direct service.”

Response to Issue Raised

The Applicant notes the feedback included in the Submission, however, the claim that any data or assessment has been deliberately omitted to skew any figures is entirely false.

The consideration of Tourism is expanded upon in Section 2.3.1.11 - Impact on Tourism, and the future growth of Howth population is included in Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth.

The DART+ Coastal North Project is being progressed to bring benefits to areas along the Northern Line and Howth Branch and the increased frequency and capacity that the Project will deliver will help support communities along these lines into the future.

7. Summary of Issue Raised

The submission claims that Irish Rail are showing arrogant disrespect for the wishes of the citizens in the Howth/Sutton area.

Response to Issue Raised

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account

6.2.100 SB0132 – Pauline Moreau

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the loss of direct services will result in increased travel times for all passengers between Howth and the city Centre. It notes that the need to transfer will result in serious inconvenience for travellers.

The submission refers to the existing population of the Howth Peninsula and the future population growth that will rely on DART Services.

Concern over the availability of capacity on southbound trains at Howth Junction & Donaghmede Station are raised.

The impacts on journey times due to the need to interchange at Howth Junction are raised as an issue. Concerns are also raised in relation to the distances to be covered as part of an interchange and the reliability and availability of lifts to cater for the less able travellers and those with children and/or luggage.

Concern is raised in relation to the exposed nature of Howth Junction & Donaghmede Station, particularly in winter conditions.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.15 - Concern around increased population in Howth,
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

2. Summary of Issue Raised

The submission highlights concern related to economic impacts. The potential for the tourist industry to be negatively impacted due to a perceived lack of access is noted. Concerns over the impacts on local businesses, cafes, restaurants etc is noted.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

3. Summary of Issue Raised

The submission calls for a public consultation / Oral Hearing to be held to address public concern.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

The submission notes the potential for traffic chaos due to increased closure times and frequencies. The potential to negatively affect the operations of emergency services, freight transport services, and bus services are raised.

Concerns are raised in relation to impact on travel times for those in private cars.

The impact on housing estates linked to the build-up of traffic at level crossings is raised as a concern.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

6.2.101 SB0133 – Pater and Margaret O'Shaughnessy

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the proposed shuttle service will inconvenience commuters. It also notes that claims about overcoming delays on the Northern Line are unsupported. The submission raises concern that the means by which a shuttle service could operate are not expanded on within the RO documentation.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity

2. Summary of Issue Raised

The submission claims that transferring trains at Howth Junction is not a viable alternative and may encourage residents to use private vehicles. It also mentions that the proposal does not align with Fingal County Council's strategy to promote public transport use and reduce private parking in residential developments.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission claims that due to population growth and new developments in Howth, it is essential to maintain the direct public transport service.

Response to Issue Raised

As described in Section 2.3.1.2 above, it is not possible to operate DART+ Coastal North at maximum capacity without the introduction of a shuttle service on the Howth Branch.

Furthermore, the Applicant fully acknowledges the expected population growth in the Howth Area over the coming years. Refer to Section 2.3.1.15 - Concern around increased population in Howth.

4. Summary of Issue Raised

The submission acknowledges Irish Rail's difficulties and shortcomings in increasing the capacity of the existing twin-track Northern line. It suggests that this "acknowledgement" is a "smoke screen" to allow the current proposals to be accepted. The submission claims that the root problem with the line is that there are only two tracks. It also highlights that adding four tracks would eliminate the need for the Howth shuttle line and should be installed as quickly as possible.

Response to Issue Raised

Refer to Section 2.3.1.16 - Need to look at alternatives .

5. Summary of Issue Raised

The submission claims that any new study needs to consider the bottleneck at Butt Bridge. It suggests that Irish Rail lacks a comprehensive overview of the Northern Line's redevelopment. It also notes the absence of detailed simulations for proposed timetables.

Response to Issue Raised

The scope of the DART+ Coastal North Project, which focuses on the delivery of infrastructure to enable an increase in DART frequency and capacity between Dublin Connolly and Drogheda, inclusive of the Howth Branch, does not extend to include a review of the Butt Bridge, or interventions to address any perceived bottle-neck at the Butt Bridge.

Iarnród Éireann is continuously working to ensure that the existing infrastructure is both resilient and reliable. Existing timetables are under regular review to ensure that the services provided continue to best meet commuter needs. The proposals in DART+ Coastal North in no way prohibit further studies into the performance of other parts of the railway network which may be completed as part of separately funded projects. Furthermore, modifications at Connolly and the provision of a new Station at Spencer Dock as part DART+ West will greatly enhance operational flexibility in the city centre, which will in turn provide greater flexibility for services through Connolly to the south of the city.

In relation to an absence of detailed simulations for proposed timetables it is important to note that the DART+ Coastal North Project is predominantly an infrastructure project, tasked with the delivery of interventions which will facilitate Train Services Specification TSS1C and the increased levels of train frequency and capacity associated with it, between Dublin Connolly and Drogheda.

The EIAR has assessed the Project based on the Project operating at a maximum level of service capacity, as per TSS1C. At the current time future timetables have yet to be developed so it has not been possible to include analysis of future timetables within the EIAR.

As noted in other responses, it is also noted that the proposed DART+ Coastal North Project will provide the infrastructure which will enable this increased frequency of service. The implementation of these operational changes will be done over time and in response to increasing demand. Any such changes, including the introduction of a DART shuttle service on the Howth Branch, will be subject to public consultation by the NTA, (known as the Timetable Customer Consultation Process) prior to implementation where any concerns of the public to the proposed timetable changes can be raised.

6. Summary of Issue Raised

The submission raises concerns about universal access issues that include on/off access to trains. It also emphasises inability of Irish Rail to provide working lifts on an ongoing basis.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

Further to the accessibility information contained in Section 2.3.1.6 it is important to note that the new DART+ Fleet which will be delivered as part of DART+ Programme has a primary objective of providing improved accessibility for train users. Low level flooring and entrance doors reduce the stepping height for passengers and improve access for persons with reduced mobility. The new carriages will prioritise independent access, with each of the low-height doorway thresholds being equipped with an automatic retractable step and offering the potential for unassisted level access from suitable platforms, aligned with platform enhancements. Further information on the DART+ Fleet project is available via the project website: <https://www.dartplus.ie/en-ie/projects/dart-fleet>

7. Summary of Issue Raised

The submission raises concerns related to security issues at Howth Junction on a constant basis throughout the day.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

8. Summary of Issue Raised

The submission raises concerns about the prolonged closure of traffic barriers affecting residents (e.g., Howth Lodge) and contributing to traffic buildup on main roads.

Response to Issue Raised

Refer to:

- Section 2.3.2.1 - Frequency and duration of Claremont level crossing closures – level of access,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.2.4 - Potential for traffic queuing to impact on Howth Road.

6.2.102 SB0135 – Residents of Asgard Road

Representative: Clíodhna Puirseil

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the loss of direct services will negatively affect already poor public transport services in the Howth area.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

The submission raises concerns relating to access for emergency services, delivery vehicles, and businesses in Howth (including Howth Harbour).

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services and
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

3. Summary of Issue Raised

The submission claims that the studies described in the proposal are not accurate. It also states that the population in the peninsula is expected to grow by over 20% with new developments approved by An Bord Pleanála. Additionally, it notes that the proposal does not account for the results of this study and mentions that the planning for new developments in the area was based on the current rail services.

The submission notes that the feedback from PC2 suggests that the loss of direct services to Dublin City Centre was cited in submissions as grounds for existing DART users from the Howth Peninsula to revert to private car usage. The submission notes a lack of alignment with national transport and climate policies.

Response to Issue Raised

Refer to:

- Section 2.3.1.9 - Inaccurate Surveys related to population growth in Howth and the ability of DART+ Coastal North to cater for this growth,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects disabled and vulnerable groups due to unreliable lifts. It also notes that the Autistic and Neurodiverse community will be negatively affected.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry. It also notes that the disruption to the DART line might deter tourists from visiting the area.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

6.2.103 SB0136 – Residents of Corr Castle

Representative: Corr Castle Management Co.CLG

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the loss of direct services will result in increased travel times and add serious inconvenience for all passengers between Howth and the city centre.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, elderly, and families with children/infants due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

The submission raises concern with impact to emergency services.

The submission notes that the result of the increase in level crossing closures and a need to interchange at Howth Junction & Donaghmede Station may push commuters away from public transport and back to private car usage.

The submission raises concerns with impact of level crossing closures on existing bus routes (H3 & No.6)

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission claims that the Proposed Development would negatively affect commuting students that rely on direct services. Accessibility and safety at Howth Junction are noted as concerns in the submission.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on tourism industry. It notes that the loss of this service will most likely damage the commercial centres of Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

7. Summary of Issue Raised

The submission claims that the proposal to add tracks servicing Connolly Station from the north should take priority over any plans to expand the existing DART by curtailing the Howth service.

Response to Issue Raised

It is important to note that any potential project involving the development of additional tracks servicing Dublin City Centre from the North remain at a very early stage. The 'Four North Project' is assessing the possibility of developing additional tracks between Malahide and Dublin Connolly, however at the time of writing the project remains in the preliminary stages. The interventions proposed by DART+ Coastal North will enable the proposed level of service frequency and capacity increases as per TSS1C, and will no way prohibit the development of future projects such as the 'Four North Project'.

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

8. Summary of Issue Raised

The submission calls for Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.104 SB0137 – Residents of Howth, Sutton and Surrounding Areas

Representative: Andrew Peirce

Submission Location – Howth, Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concern over the potential loss of direct DART services on the Howth Branch.

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers, particularly during late hours. Concerns over accessibility and safe use of the station are also highlighted.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission raises concerns that the proposal might encourage the use of private vehicles, which could have negative effects on the environment and exacerbate climate issues.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that the loss of direct services will have a negative impact on schools and community well-being, deterring families from the area.

Response to Issue Raised

Refer to Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

5. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas. It notes it might also negatively impact tourism industry by deterring visitors from the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.15 - Concern around increased population in Howth and
- Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses. It notes there are economic consequences for the developers in Howth area.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

The delivery of DART+ Coastal North will provide a doubling of DART services to and from Howth as demand grows into the future. This will serve to be of great benefit to developers in the Howth Area as the population continues to grow. Attention is again drawn to Section 2.3.1.15 - Concern around increased population in Howth.

7. Summary of Issue Raised

The submission claims that the proposal might result in the north side being left behind in terms of transport planning and infrastructure.

The submission requests a transport solution that supports, rather than hinders, public transport use, economic development, and environmental goals.

Response to Issue Raised

The Applicant acknowledges the concerns of the Observer with regards to the transport planning and infrastructure progression in Dublin's North Side.

The Applicant refutes the idea that the north of Dublin City is being left behind as a result of the DART+ Coastal North proposals. The project is providing infrastructure that will provide a turn up and go service for commuters in North County Dublin, Meath and Louth. Making train

travel more attractive to customers and reducing dependence on private car use, helping the country to reach its emission reduction targets.

The development of alternative, supplementary, or separate infrastructure projects lies within the remit of the NTA and is not subject to the aims and objectives of the DART+ Coastal North Project.

8. Summary of Issue Raised

The submission claims that the Proposed Development will have significant impact on emergency services operation, putting lives at risk.

Response to Issue Raised

Refer to Section 2.3.1.7 - Impact on Emergency services.

6.2.105 SB0138 – Residents of Parkvale Baldoyle

Representative: Cathy Wyer

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that direct DART services are vital for keeping communities connected. It notes that the direct service between the Dublin City Centre and Howth is important for sustainability, safety, accessibility, economics and tourism.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

2. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission claims that the loss of direct services will result in increased travel times for all passengers between Howth and the city centre. It emphasises that the trains coming from the North line will be overcrowded, creating inconvenience for passengers, particularly for commuters.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and parents with young children due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

7. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses. It claims that disruption to the DART line might delay deliveries and significantly extend journey times for staff and customers. It also notes that it might deter tourists from visiting the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

8. Summary of Issue Raised

The submission notes that the current proposal would remove direct services from one area to enhance services to another, significantly impacting people who reside along the Howth Branch. It claims that there is a clear opportunity to plan a schedule in which the Howth line retains direct services while still significantly improving the arrival of multiple services to Dublin City Centre. The submission emphasises that increasing infrastructure capacity by adding new lines should be prioritised over reducing the level of existing services.

Response to Issue Raised

The Applicant notes the feedback from commuters along the Howth Branch in respect of the current proposals. The introduction of a shuttle service, as outlined in Section 2.3.1.1 is required in order to deliver the increases in capacity and frequency required by the Train Service Specification TSS1C as part of the Project objectives.

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning,
- Section 2.3.1.16 - Need to look at alternatives and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account

6.2.106 SB0139 – Residents of Tramway Court

Representative: Alma Mackin

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that direct DART services are vital for keeping communities connected. It notes that removing these direct services will significantly extend transport times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and wheelchair users due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses. It claims that disruption to the DART line might delay deliveries and significantly extend journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

7. Summary of Issue Raised

The submission calls for Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.107 SB0140 – Residents of Warrenhouse Road

Representative: Karen and Brian Meenan

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times and is unacceptable to the residents of Warrenhouse Road.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission raises concern about road safety for children and elderly and dangerous driving on main road and regular breaking of pedestrian lights resulting from level crossing closures. This issue is of particular concern while level crossing gates are going down which is viewed as prompting dangerous driving and road rage in the area.

Response to Issue Raised

The Applicant acknowledges the concerns raised in the submission in relation to dangerous driver behaviour. However, how drivers react to the closing of level crossing gates, or other traffic controls such as traffic lights or stop/go systems is out of the control of Iarnród Éireann and is viewed as a matter for an Garda Síochána and the local authorities.

3. Summary of Issue Raised

The submission raises concerns about motorbikes and cars increasing their speed to outrun the gates.

Response to Issue Raised

The Applicant acknowledges the concerns raised in the submission in relation to dangerous driver behaviour. However, how drivers react to the closing of level crossing gates, or other traffic controls such as traffic lights or stop/go systems is out of the control of Iarnród Éireann and is viewed as a matter for an Garda Síochána and the local authorities.

Driver and rail user safety is of paramount importance to Iarnród Éireann and multiple campaigns have been run over the past number of years to promote safety at level crossings. Iarnród Éireann shall continue to promote safety at level crossings and will continue to work with an Garda Síochána and local authorities to help reduce the dangers associated with level crossing closures.

Every year Iarnród Éireann runs a safety campaign on International Level Crossing Safety Awareness day in conjunction with an Garda Síochána, the Road Safety Authority and Local Authorities to promote safe behaviour at level crossings.

4. Summary of Issue Raised

The submission raises concerns about child's safety. It notes that children (especially teenagers), who are stuck at the gates regularly climb over level crossings to gain access to the other side.

Response to Issue Raised

The Applicant acknowledges the concerns raised in the submission in relation to dangerous behaviour of children and others at level crossing gates. However, how individuals react to the closing of level crossing gates, mechanisms which are designed with the safety of all users in mind, is outside of the control of Iarnród Éireann and is viewed as a matter for an Garda Síochána and the local authorities.

Driver and rail user safety is of paramount importance to Iarnród Éireann and multiple campaigns have been run over the past number of years to promote safety at level crossings. Iarnród Éireann shall continue to promote safety at level crossings and will continue to work with an Garda Síochána and local authorities to help reduce the dangers associated with level crossing closures.

5. Summary of Issue Raised

The submission notes that frequent level crossing closures result in vehicles idling at the gates, leading to an increase in CO2 emissions. It also mentions that these closures exacerbate air pollution and significantly worsen traffic in the immediate areas surrounding the level crossings.

Response to Issue Raised

While the proposed increase in level crossing frequencies results in a greater likelihood of vehicles being caught at a level crossing in the future, and potential for traffic queuing is also likely to increase, this is expected to be contained within the available road space surrounding level crossings. Details of impacts of the level crossing closures on traffic are provided in Chapter 6 of the EIAR and in Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

The impact of the future revisions to level crossing closure frequencies and durations on air quality has been considered as part of the development of DART+ Coastal North and is not considered to result in any significant impact.

The proposed doubling of DART services on the Howth Branch is proposed to encourage a modal shift away from private car usage along the Howth Peninsula. This modal shift will have a positive impact on CO2 emissions. Further details of Air Quality assessments are contained in Chapter 12 of the EIAR.

It is important to stress that vehicles will not actually be waiting for 30mins out of each hour. The likelihood of a vehicle being caught at a level crossing will increase with increased

frequency of services when DART+ Coastal North reaches maximum capacity. Wait times will increase in some cases, but not by an overly significant margin as described in Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6. Summary of Issue Raised

The submission raises concerns about the negative impact of the Proposed Development on emergency services operations due to the frequent closure of the level crossing. Wheelchair users and Residents of care homes on Warrenhouse Road may suffer due to emergency services being stuck at level crossings more regularly.

Response to Issue Raised

Refer to Section 2.3.1.7 - Impact on Emergency services.

7. Summary of Issue Raised

The submission notes a negative impact on all other forms of transport to facilitate the increased level of DART frequency. The submission notes that Warrenhouse Rd is a key artery for Busses, Taxi's, cyclists and pedestrians.

Response to Issue Raised

The Applicant acknowledges that the delivery of increased frequency and duration of level crossing closures will have an impact on traffic in the surrounding areas. However, the impact is not considered to be significant and the traffic assessment detailed in Chapter 6 of the EIAR concludes that the level crossings can continue to operate and provide an acceptable level of cross connectivity even when the DART+ Coastal North Project reaches maximum capacity.

8. Summary of Issue Raised

The submission notes concern over the potential loss of direct services to Dublin City Centre from Howth and raises issues/concern with a need to interchange at Howth Junction & Donaghmede Station.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

9. Summary of Issue Raised

The submission raises concerns relating to increased traffic and air pollution related to the increase in level crossing closure frequency and duration. Concerns are raised with idling traffic and resulting air pollution resulting from drivers not turning off engines while waiting at level crossing gates.

Concerns are again raised that the main road will be effectively closed for 30mins of every hour.

Response to Issue Raised

Refer to response #6 above.

10. Summary of Issue Raised

Impact on Sustainable Travel and National Policy. The Submission notes that 77% of people who responded to the PC2 questionnaire noted that they would not be encouraged to use public transport over private car use and that the loss of direct services to Dublin City Centre would act as grounds for people to revert to private car usage. The submission notes that “removing direct DART services does not align with national transport and climate policy”

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

11. Summary of Issue Raised

The submission raises concern in relation to accessibility issues at Howth Junction & Donaghmede Station for those with disabilities, limited mobility, and wheelchair users where there is a need to use lifts. Concerns are raised in relation to the frequency of lifts being out of service around the rail network.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

12. Summary of Issue Raised

The Submission raises concerns for impacts on local businesses resulting from delays incurred by increased frequency and duration of level crossing closures.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

13. Summary of Issue Raised

Wait times currently exceeds other countries. The submission notes that wait times are already excessive and queries why this is the case in Ireland, and on the Howth Branch.

Response to Issue Raised

Refer to Section 2.3.1.4 - Improvements/ Optimisation of Level Crossings.

14. Summary of Issue Raised

The submission requests that An Bord Pleanála calls an oral hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.108 SB0141 – Richard & Elaine Roddy

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the loss of direct DART services raises concerns among families with small children that currently rely on the direct line service.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development would have on local businesses and the tourism industry in Baldoyle, Sutton, and Howth. The dual effects of increased traffic congestion and the potential loss of direct services will most likely result in delivery delays, loss of customers, difficulty finding staff to work in local businesses, and ultimately, loss of revenue with business closures inevitable.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

5. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It notes that the proposed design will create difficulties for families with small children to navigate through the station and the need to use lifts will significantly worsen the situation.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission proposes a four-track alternative solution between Connolly and Drogheda to retain the direct line service to Howth while allowing for the extension of the DART to Drogheda.

Response to Issue Raised

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

6.2.109 SB0143 – Roderick Cooper

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the disruption of the existing direct service line will impact the increasing population around Howth, Baldoyle and Bayside.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It notes that it will be challenging for less mobile people to navigate the station due to the footbridge and the increased distance to the platforms.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. The submission notes that the plan could negatively affect wider road network, buses and emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and

- Section 2.3.1.7 - Impact on Emergency services.

4. Summary of Issue Raised

Submission noted that the provision of the new infrastructure as part of the 4North project would alleviate the need for DART + Coastal North.

Response to Issue Raised

The Applicant acknowledges the observations included in this submission with regards to the need for the DART+ Coastal North Project. However, the claim that the 4North project would alleviate the need for the DART+ Coastal North Project is refuted.

While the benefits of the interventions currently being considered by the 4 North Project will likely support the development of the Northern Line into the future, the Project is not required in order to deliver the Project objectives of the DART+ Coastal North Project.

Refer to:

- Section 2.3.1.16 - Need to look at alternatives ,
- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.2.7 - Calls for Additional Track Capacity (South of Howth Junction & Donaghmede).

6.2.110 SB0144 – Roger Stalley

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission notes that the population growth timeline is not included in the documentation. It mentions that the assumptions regarding future rail commuters on the Drogheda to Dublin route are optimistic. Additionally, it points out that the forecast does not appear to take post-Covid working practices into account.

The submission also raises concerns that accessibility for the existing and proposed populations (on the opposite side of the Boyne River and at Lush and Lusk stations) was not considered, and commuters might opt out of using rail services.

Response to Issue Raised

It is important to note that the proposals of DART+ Coastal North will enable the provision of increased frequency and capacity on the Northern Line. The increases are not likely to be implemented upon completion of the Project but will allow for the level of service on the Northern and Howth Branch lines to gradually be introduced in line with future demand.

At the current time operational timetables have yet to be developed. The implementation of these operational changes will be done over time and in response to increasing demand. Any such changes, including the introduction of a DART shuttle service on the Howth Branch or significant timetable changes on the Northern Line, will be subject to public consultation by the NTA, (known as the Timetable Customer Consultation Process) prior to implementation, where any concerns of the public to the proposed timetable changes can be raised.

Potential works to aspects such as accessibility at stations will continue to be addressed by Iarnród Éireann through other separate projects. Section 2.2.8 - Improvement to Station Amenities (accessibility, public realm) .

2. Summary of Issue Raised

The submission indicates that the operational practice and the development of timetables is theoretical and based on assumptions. It also notes the absence of any mention of freight within DART+ Coastal North documentation and its integration into the timetable, considering the migration of freight from road to rail as part of the all-Ireland strategy.

Response to Issue Raised

Assumptions are used in lieu of a future timetable to ensure that the TSS can be met by the infrastructure improvements proposed. The only existing freight movements are by Tara trains, 2 trains per day, which have been considered in the modelling.

The capacity analysis carried out for DART+ has been based on maximum capacity utilisation of the network by passenger services. This maximum capacity would be utilised during the 6 peak hour periods (3 hours AM Peak & 3 hours PM Peak). A standard operational day typically consists of 19 hours of operation, in the 13 off peak hours service levels would reduce by 40% -50% of the peak hour capacity. The service reduction during these 13 off peak hours creates the opportunity for the operation of freight services to utilise this available capacity.

3. Summary of Issue Raised

The submission claims that the loss of direct services will result in increased travel times for all passengers between Howth and the city centre. It emphasises that waiting times and walking times were not considered in the calculations. The submission also notes that the frequency of the trains will lead to a degradation in speed and have implications for intercity trains, limiting the speed on the line.

Response to Issue Raised

Again, it is important to note that future timetables have yet to be developed. The Applicant would like to make it clear that those concerns that have been raised in the submission have been considered as part of the project development and are addressed in the sections of this report referred to below:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of a Direct Service

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.2.19 - Impact on Intercity/Enterprise Trains.

4. Summary of Issue Raised

The submission claims that the Proposed Development will have a direct impact on services extending north of Drogheda.

It claims that no consultation was offered to Northern Ireland residents who commute to Dublin. It also claims that no alternative solutions have been investigated, such as four-tracking the route at the Dublin end.

Response to Issue Raised

The Applicant acknowledges that DART+ Coastal North will have an interaction with services originating from, and continuing to, the north of Drogheda. These interactions are commented upon in more detail in Section 2.2.19 - Impact on Intercity/Enterprise Trains.

As noted in Section 2.2.19, the future Enterprise journey times have not been quantified in the DART+ Coastal North assessments as they will be dependent on future timetables. Actual journey times, and timetables, for DART services originating from Drogheda, Malahide, Clongriffin and Howth, have yet to be determined. These will vary depending on operational decisions and priorities at that time, of which there are many variations and options to consider. Any substantial timetable change will go through a public consultation process of its own organised by the NTA known as the Timetable Customer Consultation Process.

Separately to the proposals within the DART+ Coastal North Project Railway Order application, Iarnród Éireann are continuing to work on and develop complimentary measures seeking to improve performance and reliability for all services on the Northern Line. These complimentary measures include general upgrades to tracks and signalling, the potential introduction of additional passing loops, and consideration of 4-tracking between Malahide and Dublin City Centre as part of the Four North Project.

5. Summary of Issue Raised

The submission highlights security and safety concerns at Howth Junction, stating that the Proposed Development lacks inputs from behavioral science.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction and Donaghmede as an interchange point. It suggests that the station's design lacks shelters for significant walking distances and overhead protection for the steps leading to the footbridge. It also notes that it would be challenging for less mobile and low-energy commuters to navigate the station.

Response to Issue Raised

Section 2.3.1.6 details the proposed upgrades to the Howth Junction & Donaghmede Station which will both improve the passenger experience generally and develop the station to better serve as an interchange station into the future. This includes for example (and addressing specific concerns raised in some of the submissions) the provision of additional shelter on the platforms for those who might be interchanging in the future.

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

7. Summary of Issue Raised

The submission claims that frequent level crossing barrier closures will worsen traffic, have environmental and social impacts on residents living in houses fronting the road, affect pedestrians, and increase the risk of accidents. It also raises concerns about the general potential loss of road connectivity.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6.2.111 SB0145 – Ronan Mannion, Alison McQuaid, Darren Cowzer, Catriona Loftus, Niall McNamarra, Sarah Williams, Ann Williams, Fergus McNamarra, Deirdre McNamarra

Representative: Ronan Mannion

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It notes that it could negatively affect wider road network and buses services.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission claims that the loss of direct connectivity to Dublin City is likely to result in increased inconvenience for commuters. It mentions that the disruption to the DART line could provoke the increase of car usage.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

4. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses and the tourism industry. The loss of direct services would lead to further delivery delays and longer journey times for staff and customers. Additionally, the loss of direct services could deter tourists from visiting the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

5. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and wheelchair users due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers. It also emphasises that due to unsafe conditions, people could deter from using indirect DART that could put additional pressure on bus services or lead to increased traffic due to more people travelling by car.

Response to Issue Raised

Refer to:

- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

6.2.112 SB0146 – Rosemary O'Neill

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that direct DART services from Howth, Sutton and Bayside to the city centre and beyond are vital to keep communities connected.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and elderly due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses. The loss of direct services would lead to further delivery delays and longer journey times for staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission calls for Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.113 SB0147 – Sarah Robertson

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the increase in population in Howth highlights the crucial need for a direct and convenient DART service for its residents.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission asserts that Irish Rail has not adequately explored alternative options. It claims that, since Irish Rail has recently announced a study to examine the feasibility of additional lines in the Project, it would be unlawful for the Board to decide on the application before the completion of the study.

It was proposed that the DART line could alternatively be routed underground from Howth Junction to Howth, converting the existing above-ground track into a greenway.

Response to Issue Raised

Alternatives to the proposals included in the DART+ Coastal North RO Application are set out in Chapter 3 of the EIAR. Additional reference should be made to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives

6.2.114 SB0148 – Sarto Park Neighbours

Representative: Richard Kiernan

Submission Location – Bayside (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission asserts that the Proposed Development fails to consider the anticipated population growth in the area. It argues that this oversight is unreasonable, given the numerous residential projects currently in the planning stages.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. It notes that it could negatively affect wider road network, buses and emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. The submission notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and parents with young children due to unreliable lifts at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission proposed two alternatives:

- Irish Rail to consider upgrading the signalling to facilitate retaining the Howth direct line.
- Explore the existing train gaps and block sections in relation to efficiencies.

Response to Issue Raised

Implementing new signalling on the Howth Branch or on the mainline will not enable an increase in capacity that would allow a direct service to Howth to be maintained with the proposed future frequency of trains on the Howth Junction - Malahide section. The limiting conditions are the crossing movements required for trains routed towards Howth and trains from the Howth branch attempting to merge with the traffic coming from the Malahide direction. These movements place a major constraint on the number of trains that can pass through Howth Junction and maintaining these movements would prevent achievement of the ultimate Train Service Schedule.

The CCRP project completed up to 2010 renewed the signalling in the Howth branch and Howth Junction sections with the objective of maximising throughput while at the same time minimising the impact of the service on other trains and level crossings. The design by necessity prioritises unimpeded train movement - maximising speed through the area to minimise the time barriers are down. Operationally, the conditions to initiate level crossing closures and to minimise the impact on Level Crossing users were carefully reviewed. The design was improved where possible to reduce impact within the constraints imposed by the train performance. These constraints are fundamentally unchanged since the time the design was completed. Based on this, there is no feasible improvement to the signalling design that can mitigate the capacity impact of the Howth Junction crossing or level crossings closure time.

Further information relating to operational efficiencies can be found in Section 2.3.1.4 - Improvements/ Optimisation of Level Crossings.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses and the tourism industry. The loss of direct services would lead to further delivery delays and longer journey times for staff and customers. Additionally, reduced tourist footfall would negatively affect businesses on the Howth peninsula.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6.2.115 SB0149 – Sean & Eimear Cremen

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about accessibility issues related to the proposal. It highlights that even the Non-Technical Summary was inaccessible to individuals with intellectual disabilities. It suggests that providing guidance on better engagement with people with disabilities throughout the consultation process would have been beneficial. Additionally, it recommends that the Project team could have engaged with organisations such as the National Disability Authority, the CRC, AsIAM, or Inclusion Ireland.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable for further information.

With regards to consultation, IE has worked hard to communicate widely and clearly with the general public, throughout the Project development thus far, including two non-statutory public consultation periods, as described in the PC1 and PC2 Findings Report submitted with the Railway Order application.

As part of the communication strategy, A Community Liaison Officer (CLO) has been available to engage with anyone seeking information relating to the DART+ Coastal North Project, and a CLO will be appointed and remain in place for the duration of the Project. The CLO will be in place to communicate with residents and impacted parties, and to address any concerns that may be raised in relation to the Project going forwards.

Iarnród Éireann regularly engages with disability user groups with regards to projects and timetable considerations. The Iarnród Éireann Disability Users Group (DUG) was established in 1995. Its purpose is to engage with organisations representing people with disabilities to improve accessibility to our network, stations and on-board trains. The DUG is an advisory group for Iarnród Éireann. The Group is independently chaired with 16 members and has evolved organically since it's foundation in 1995. The DUG mission is to be a key contributor

to the transformation of all Iarnród Éireann services to be universally accessible to, and inclusive of, everybody. As part of the detailed design process for DART+ Coastal North, the project team has sought to ensure that the needs of those with disabilities are addressed and the upgraded infrastructure will give the best possible experience to all of our disabled customers.

New Fleet

Our Disability User Group were part of the design phase process to gather feedback for the interior and exterior design of the new fleet which is expected to enter service in 2026.

Accessibility is a key deliverable of DART+ fleet and an objective of Iarnród Éireann and the National Transport Authority for the ongoing expansion of the railway as a major public transport provider. The key accessibility issue from a train interface perspective is the platform gap and platform height. Great effort went into the specification of the new DART+ trains to ensure passenger accessibility is transformed on the DART railway. The vehicle tenderers were incentivised to focus on the carriage floor height above platform, proposals to address the platform gap as well as accessibility features for mobility impaired customers.

2. Summary of Issue Raised

The submission notes that no disability organisations were engaged during the pre-application period, as documented in the minutes dated 20/01/2022, 31/03/2022, 05/04/2023, 17/06/2023, and 16/10/2023. It claims that disabled citizens affected by the introduction of a shuttle service were excluded from the planning phases, consultation process, assessments, and auditing. It emphasises that the system involved in this process was not set up to include their voices in a meaningful way, which is critically important. The submitter believes this to be a violation of their rights. It also notes that the proposal lacks a Disability Impact Assessment. The submission urges An Bord Pleanála to deny Córas Iompair Éireann (CIE) permission to introduce a shuttle service to Howth and interchange at Howth Junction on the basis that disabled citizens and disability organisations were not meaningfully consulted or engaged.

Response to Issue Raised

As noted above, accessibility considerations for those commuters with disabilities, or additional needs, is discussed in detail in Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

The views and opinions of all commuters, including those with any disability are considered of great value in the development of projects such as DART+ Coastal North. The proposed development has considered accessibility as part of the project development and is confident that the proposed development will provide for the needs of disabled customers.

3. Summary of Issue Raised

The submission claims that the health effects on the population associated with a loss of direct services to Howth, particularly the psychological impacts, were largely ignored. It notes that

the risks associated with an interchange/shuttle service to the population are largely undocumented, and mitigation measures are mostly excluded.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.2.16 - Health Concerns.

6.2.116 SB0150 – Minister Sean Haughey T.D.

Representative: n/a

Submission Location – Dublin 2 (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission indicates that the loss of direct DART service is perceived as a downgrade of the service between the city centre and Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times at Station Road, Sutton and at the Baldoyle Road.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on the tourism industry.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

5. Summary of Issue Raised

The submission raises concerns about the increasing population in the area and the proposed new housing developments.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

6.2.117 SB0151 – Sheila Courtney, Kevin Courtney, Paul Courtney, Amanda Coutney, Alan Courtney, Maebh Courtney

Representative: Sheila Courtney

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the loss of direct DART services to Howth, Sutton, and Bayside will disrupt community connectivity and undermine long-standing transport links. It notes that the lack of direct services contradicts national transport and climate policies, as many residents reported that they would revert to car usage.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study

indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It claims that the shuttle service disproportionately affects individuals with disabilities, limited mobility, and students due to unreliable lifts and unsafe conditions at Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission claims that increased travel times and delays will negatively impact local businesses in Baldoyle, Sutton, and Howth by deterring customers and delaying deliveries.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on the approved new housing projects. It emphasises that the direct DART service was likely a key factor in approving these housing developments, making its removal a potential oversight.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

6. Summary of Issue Raised

The submission calls for Oral Hearing to fully address the significant community concerns raised in the submission.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.118 SB0152 – Siobhán Keegan, Piergaetano Iaccarino

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that removing direct services to Dublin City Centre will disrupt community connections, reduce public transport use, and lead to negative economic, social, and environmental outcomes. It notes that the inconvenience of the shuttle service will likely push users back to private car use, contradicting national policies aimed at promoting public transport and climate action.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service,
- Section 2.3.1.11 - Impact on Tourism,
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It notes that Requiring passengers to transfer at Howth Junction, with frequent lift malfunctions and crowded platforms, will disproportionately affect wheelchair users, parents with children, and elderly passengers.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on the local businesses and tourism industry. It emphasises that increased travel times could harm businesses, discourage new investments, and lead to fewer tourists visiting Howth, Sutton, and nearby areas.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

5. Summary of Issue Raised

The submission raises concerns about longer commuting times for school students and increased difficulty in attending extracurricular activities, potentially limiting educational choices in the area. It notes that more complex journeys, unreliable transport, and longer wait times will increase commuter stress, reduce work-life balance, and negatively affect mental and physical health.

Response to Issue Raised

Refer to Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

6. Summary of Issue Raised

The submission claims that national policy encourages the use of sustainable transport. However, 77% of participants in the second consultation indicated they would not be motivated to switch from cars to DART. It notes that the loss of direct services from Howth to the city centre will result in many users reverting to car use, which will cause an increase in traffic, accidents, noise pollution, and a deterioration in road conditions. The submission also notes that the Proposed Development plan is inconsistent with national policy and climate goals.

Response to Issue Raised

Refer to:

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

6.2.119 SB0153 – St Domhnach's Well Residents Association

Representative: John McDermott

Submission Location – Howth Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission claims that the proposed changes will overwhelm Howth Junction Station, making it difficult for passengers to board already crowded trains, especially during peak commuting hours.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

3. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission claims that the loss of direct services will result in an increase in travel times for all passengers between Howth and the city centre, particularly affecting commuters.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

5. Summary of Issue Raised

The submission claims that the lack of direct DART services undermines community connectivity, leaving Howth, Sutton, and Bayside less integrated with the City Centre.

Response to Issue Raised

The Applicant acknowledges the concerns of the Observer with regards to community connectivity. The DART+ Coastal North Project in no way intends to dilute the level of connectivity between the Howth Peninsula and Dublin City Centre. The proposed changes resulting from DART+ Coastal North are proposed to facilitate a greater level of service and connectivity between the Howth Branch and Dublin City Centre, while maximising the level of frequency of service offered on both the Northern and Howth Branch lines.

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account

6.2.120 SB0154 – Stephaney Bissett

Representative: n/a

Submission Location – Malahide

1. Summary of Issue Raised

The submission notes concern in relation to the inclusion of areas along the northern side of Bisset's Strand, used by residents for parking and bin collection. The submission notes provision for alternative arrangements are not included in the DART+ Coastal North Proposals. The concerns relate to the proposed construction compound referred to by reference 10.10 on Works Layout Plan No. 10 Malahide Station and Surrounds, in figure 1 below.

The submission notes that the area in question is used by 7 houses for regular bin collection, and the parking spaces are used by residents of the Strand, commuters availing of Malahide Station and Shoppers in the Malahide area. The submission notes that alternative permit parking is not available to the residents who rely on these parking spaces, and that existing parking spaces on the sea-side of Bisset Strand are also included within the extents of the construction compound and will not be available to residents for the duration of the construction works.

As part of the ongoing Broadmeadow Way construction works, 4 new residents parking spaces are being provided. The submission queries what will happen to the spaces when the Broadmeadow Way works are completed in 2026 as planned.

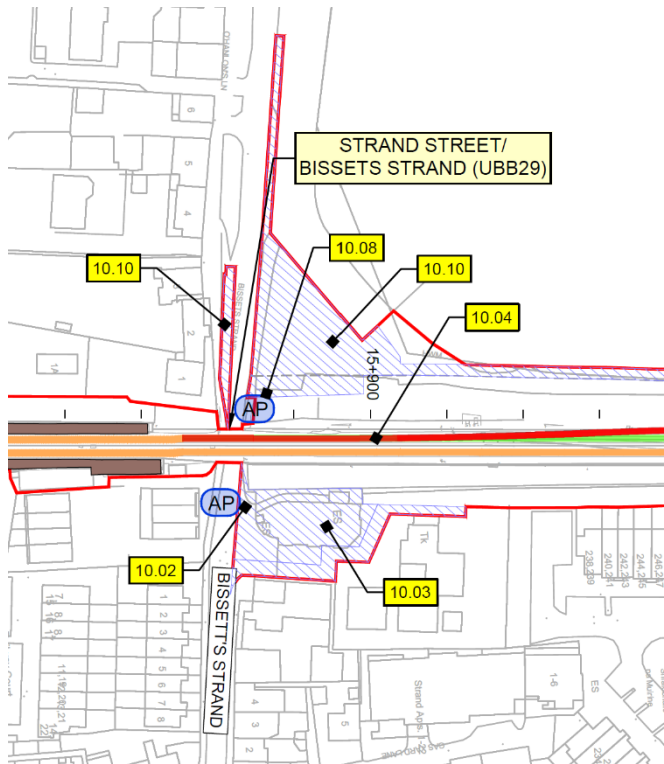


Figure 32 - Figure 1: Extract from Works Layout Plan No. 10 Malahide Station and Surrounds from SB0154

Response to Issue Raised

1. Need for the space on the northern side of Bisset Strand

The area included within the extents of the Project boundary relevant to this submission have been included as this space is expected to be required to facilitate larger vehicles turning to access the proposed construction compound that is located on the opposite side of the road to this strip. A total of 10 carparking spaces will be required for turning movements into the compound (both sides of Bisset Strand).

The turning requirement is foreseen as a result of the restricted haul road width. As the access to the site will be from the west only, the plant and vehicles will need to turn at least once due to space restrictions, i.e. the vehicles will need to reverse up the haul road or reverse out of the haul road. Therefore, there needs to be adequate space for the vehicles to turn without significant traffic management impacting on the public on Bisset's Strand. The Applicant therefore is not in a position to change this requirement and it is requested that the requirements as set out in the Railway Order application are included in any permission.

2. Duration of disruption & extent of impact on parking spaces.

It is unlikely that this area will be required for the duration of the Project and the actual requirements for its use will be confirmed at a later date when, subject to all necessary approvals and funding being secured, a contractor is appointed, and a construction traffic management plan (CTMP) is developed and finalised.

Currently it is foreseen that impact on the strip of land containing the existing parking spaces and bin collection area would be sporadic and based on future sequencing of works and material/plant access requirements.

The contractor will minimise the Construction Compound footprint throughout the construction programme and return the maximum number of car spaces back to public use when construction works are completed, and the compounds are no longer required

3. Management of the Construction Phase Impacts.

Chapter 5 of the EIAR describes in detail the proposed construction strategy of the DART+ Coastal North Project.

Chapter 5 describes the construction programme, phasing, and methodology for the proposed DART+ Coastal North Project, referred to hereafter as “*the Proposed Development*.” The chapter should be read in conjunction with Chapter 4 (Description of the Proposed Development), in Volume 2 of the EIAR, which gives a detailed description of the Proposed Development and with the technical design drawing and figures included in Volume 3A of the Environmental Impact Assessment Report (EIAR).

Appendix A5.1 provides a Construction Environmental Management Plan (CEMP)

The CEMP applies to all works associated with the Proposed Development. As a contractor has not yet been appointed, this CEMP has not been formally adopted and further development and commitment to the CEMP will be undertaken following selection of Contractors and before commencement of site works. The CEMP presents the approach and application of environmental management and mitigation measures for the Construction Phase of the Proposed Development. tion Phase of the Proposed Development, on the environment and the local communities, are avoided or minimised as far as reasonably practicable. It does not describe mitigation measures relating to the Operational Phase and any future decommissioning of the Proposed Development. These are provided in the mitigation sections of the EIAR Chapters in Volume 2 of the EIAR and are summarised in Chapter 27 (Summary of Mitigation and Monitoring Measures). The CEMP provides the environmental management framework for the appointed Contractors and sub-contractors as they incorporate the mitigating principles to ensure that the work is carried out to reduce adverse effects on the environment. The construction management staff as well as contractors and sub-contractors’ staff must comply with the requirements and constraints set out in the CEMP in developing the finalised CEMPs. The key environmental aspects associated with the construction of the DART+ Coastal North Project, the appropriate mitigation and monitoring controls, are identified in this CEMP and its supporting documentation. The implementation of the requirements of the CEMP will ensure that the Construction Phase of the Project is carried

out in accordance with the commitments made by CIE/IÉ in the Railway Order application process for the Proposed Development, and as required under the Railway Order. Once commenced, the CEMP is considered a living document that will be updated according to changing circumstances on the Project and to reflect current construction activities. The CEMP will be reviewed on an ongoing basis during the construction process and will include information on the review procedures.

Iarnród Éireann will ensure that effective communications channels between the community and the Project team are maintained throughout the Project, including in the period prior to commencement of construction.

A Community Liaison Officer will be appointed for the duration of the construction works, to guarantee adequate continuous communications with residents, discuss any matters that may be raised and to address any concerns raised during the construction phase.

2. Summary of Issue Raised

The submission raises concerns relating to the location of the proposed access point for heavy construction equipment to the temporary construction compound located at the junction of Bisset Strand and the Malahide Causeway (currently serving as a construction compound for the Broadmeadows Way).

The submission queries the proximity of the proposed access point to a protected railway overbridge listed in the FCC Record of Protected Structures, raising concerns about safety and logistical feasibility of the access. The submission notes that, in the view of the submitter, the existing access point to the Broadmeadows Way construction compound may be a more appropriate access point to the future DART+ Coastal North construction compound than what is proposed in Works Layout Plan No.10. states that the use of the proposed access point, in close proximity to the existing railway bridge, may not be suitable for the type of plant required by DART+ Coastal North, stating “it appears that the proposed access point is not sufficient for the safe access and egress of equipment etc” In the view of the submitter, the use of the existing Broadmeadows Way construction compound access point would be a more appropriate access and would also leave the existing parking bays referred to in Point 1 above available for use.

Response to Issue Raised

A key consideration with regards to the location of the construction compound access point is the need to coordinate with the Broadmeadow Way project being progressed by Fingal Co Council, expected to conclude circa 2026. Consultation has taken place between both the DART+ Coastal North Team and members of the Broadmeadows Way project team as part of the development of the DART+ Coastal North proposals and construction strategy. Minimising the overall impact on the Broadmeadow Way has been a major factor in the development of DART+ Coastal North in this location.

The turning requirement is foreseen as a result of the restricted haul road width. As the access to the site will be from the west only, the plant and vehicles will need to turn at least once due to space restrictions, i.e. the vehicles will need to reverse up the haul road or reverse out of the haul road. Therefore, there needs to be adequate space for the vehicles to turn without significant traffic management impacting on the public on Bisset's Strand. The Applicant therefore is not in a position to change this requirement, and it is requested that the requirements as set out in the Railway Order application are included in any permission.

6.2.121 SB0155 – Sutton Park & Lawn Residents Association

Representative: Noel West

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the removal of direct DART services will undermine community connectivity for Howth, Sutton, and Bayside residents, while contradicting decades of transport planning for the area. It notes that the shift from direct services to a shuttle undermines national goals of promoting public transport and reducing car dependency.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

2. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times, particularly at Sutton Cross and Baldoyle Road. This would create ripple effects throughout the local road network and impact emergency vehicle response times.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction as an interchange point. It notes that required transfer at Howth Junction will disproportionately impact disabled individuals, elderly users, and families with young children due to overcrowded platforms and unreliable lift infrastructure.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission raises concerns about safety issues at Howth Junction. It notes that the lack of security measures could discourage public transport use and raise serious concerns about passengers' well-being.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on local businesses. It notes that businesses in Sutton, Bayside, and Howth will face increased delivery delays and reduced customer footfall, negatively affecting local economies and employment opportunities.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission asserts that the plan fosters division between the Northern Line and Howth Branch communities, eroding trust in public consultation and the perceived fairness of the planning process.

Response to Issue Raised

The Applicant acknowledges the concerns raised by the Observer and stresses the ongoing importance of the people of the Howth Branch to Iarnród Éireann services. The interventions proposed by DART+ Coastal North are seen as the most appropriate measures to deliver the maximum level of service on both the Northern Line and Howth Branch and to enable the increases in frequency proposed by TSS1C.

Refer to Section 2.3.1.18 - Concerns of the people of Howth being taken into account

7. Summary of Issue Raised

The submission calls for Oral Hearing

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.122 SB0156 – Sutton Tidy Towns

Representative: Ultan O'Neill

Submission Location – Howth Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road, Sutton Cross, and Station Road, severely disrupting movement for residents and emergency vehicles. It also notes that prolonged closures at Claremont Road, Lauder's Lane, Station Road, and Baldoyle Road crossings will drastically limit traffic movement, impacting residents, businesses, two national schools, and three secondary schools in the area.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic,
- Section 2.3.1.7 - Impact on Emergency services,
- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

2. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development will have on existing DART users along the Howth Branch line. It argues that replacing direct DART services with a shuttle will make public transport less attractive and practical for current users, resulting in reduced accessibility for non-local travellers. The change at Howth Junction will decrease the reliability and convenience of public transport for commuters, tourists, and leisure travellers.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.11 - Impact on Tourism.

3. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It notes that the lack of adequate infrastructure at Howth Junction (e.g., stairs, unreliable lifts) makes the station inaccessible for elderly passengers, disabled individuals, and families with young children.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

The Applicant further notes that there is not a “*reduction in services provided to residents of Howth*” relating to the DART+ Coastal North Project, conversely, the project will enable a doubling of services as required in line with demand for services into the future.

6.2.123 SB0158 – Tess Tattersall

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would exacerbate the existing traffic congestion caused by the level crossing barrier closing times. This will result in worsened traffic congestion, negatively impacting bus services. It also notes that the Proposed Development will lead to inadequate public transport provisions for schools, as the closure of crossings for longer periods during pick-up and drop-off times will considerably worsen the situation.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.10 - Access to schools on the Howth Peninsula will be impacted by loss of direct service and increased level crossing closures.

2. Summary of Issue Raised

The submission claims that more frequent shuttle services will result in more frequent level crossing closures. It emphasises that increased vehicle idling at level crossings will lead to higher emissions, exacerbating air pollution and contributing to respiratory and cardiovascular health risks.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

3. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development will have on existing DART users along the Howth Branch line. It notes that new developments in Howth will lead to an increased population in the area. The submission notes that the increase in population coincides with a reduction in services provided to residents of Howth. It also emphasises that inconvenience using Dart services could lead to increased car usage.

Response to Issue Raised

Refer to:

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.15 - Concern around increased population in Howth.

The Applicant further notes that there is not a “*reduction in services provided to residents of Howth*” relating to the DART+ Coastal North Project, conversely, a doubling of services is proposed in line with demand for services into the future.

4. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers, particularly for children and elderly users transferring at the station.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission highlights accessibility issues concerning the Proposed Development's plans to use Howth Junction as an interchange point. It emphasises that changing trains at Howth Junction involves traversing 400 steps, which poses a significant challenge for elderly passengers, individuals with disabilities, and parents with buggies, especially given the frequent lift malfunctions.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development would have on local property values. It notes that many residents purchased homes at a premium due to the direct DART service. It emphasises that the proposed changes would devalue properties by removing a key transportation advantage.

Response to Issue Raised

Iarnród Éireann is not in a position to comment on future property values. The service frequency and capacity improvements proposed as part of DART+ Coastal North are expected to provide significant benefits to those areas surrounding the Northern Line by providing a more frequent and reliable rail service.

If the Railway Order is granted, compensation will be addressed in accordance with statute and standard Compulsory Purchase practice and procedure, if and when statutory notices are served. i.e. the property owner will be entitled to submit a claim for compensation once the Railway Order is granted and an official notice is sent. More information on CPOs and compensation is available on the website of the Society of Chartered Surveyors Ireland: <https://scsi.ie/a-clear-guide-to-compulsory-purchase-orders-and-compensation/>

7. Summary of Issue Raised

The submission recommends prioritising the development of additional tracks between Connolly Station and Malahide to increase capacity, while maintaining direct DART services for Howth, Sutton, and Bayside.

Response to Issue Raised

Refer to:

- Section 2.2.7 - Calls for Additional Track Capacity (South of Howth Junction & Donaghmede),
- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning and
- Section 2.3.1.16 - Need to look at alternatives .

6.2.124 SB0159 – Tessa Robinson, Una Sealy, Siobhán Bourke, Jobst Greave

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

2. Summary of Issue Raised

The submission claims that the loss of direct services will result in an increase in travel times for all passengers between Howth and the city centre.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

3. Summary of Issue Raised

The submission highlights potential accessibility issues with the Proposed Development's plan to use Howth Junction as an interchange point. It mentions that unreliable lifts and complex platform changes at Howth Junction create barriers for wheelchair users, elderly passengers, parents with buggies, and cyclists.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development will have on existing DART users along the Howth Branch line. It notes that new developments in Howth will lead to an increased population. The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development would have on local businesses and the tourism industry in Howth. The dual effects of increased traffic congestion and the potential loss of leisure travellers are highlighted as significant issues.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development will have on existing DART users along the Howth Branch line. The submission notes that Howth residents and visitors have had a direct service to and from Bray/Greystones via Dublin City Centre since its inception and have a legitimate expectation that this service will continue.

Response to Issue Raised

The Applicant would like to make it clear that DART services to and from Howth are not being jeopardised by DART+ Coastal North. In order to continue to deliver increased capacity in line with commuter demand interventions are being proposed to facilitate this increase through the operation of a shuttle service on the Howth Branch when operational conditions require it.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

7. Summary of Issue Raised

The submission indicates that there are no suitable facilities for people traveling with bicycles at the station. It highlights that the need to use lifts when changing platforms will cause significant inconvenience for travellers.

Response to Issue Raised

The Applicant acknowledges the need to continue to improve station facilities. However, outside of those project upgrades proposed by the DART+ Coastal North Project, additional upgrades such as the provision of cycling facilities are not proposed as part of the Project.

Upgrades such as improvements to bicycle parking may be progressed as part of other Iarnród Éireann projects, and DART+ Coastal North in no way precludes their development as part of future, separately funded, projects.

Refer to Section 2.2.8 - Improvement to Station Amenities (accessibility, public realm) .

8. Summary of Issue Raised

The submission claims that the Proposed Development is unsustainable as it will discourage a number of current and potential users of this public transport service from using the service as a result of the convenience and potential danger of a shuttle. It is noted that the Proposed Development will instead drive them to return to or continue to use their cars to commute increase pressure on road traffic and consequential negative impacts on the environment.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable,
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station,

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station and
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6.2.125 SB0161 – The Residents of Dargan's Way

Representative: Michelle O'Connor and Mark Carey

Submission Location – Howth Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are. The submission also emphasises that the number of shuttles cannot be reduced as this would lead to increased waiting time.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

2. Summary of Issue Raised

The submission highlights historical concerns about anti-social behaviour around Howth Junction. It claims that the proposal increases the risk of harm to passengers. The submission emphasises that the current safety measures discussed by Irish Rail, such as CCTV cameras and lights, are insufficient.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

3. Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plan to use Howth Junction as an interchange point. It notes that, given Irish Rail's history with out-of-order lifts, this change—which would require the use of different platforms—would be detrimental to people with physical disabilities or mobility issues. The submission emphasises that the proposed changes cannot ensure the safety of the large number of passengers disembarking at the same time.

Response to Issue Raised

Refer to:

- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission claims that the increase in population coincides with a reduction in services provided to residents of Howth and the surrounding areas.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

5. Summary of Issue Raised

The submission claims that the loss of direct services will result in an increase in travel times for all passengers between Howth and the city centre.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

6. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development could have on the tourism industry. It claims that the disruption to the DART line might deter tourists from the area.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

7. Summary of Issue Raised

The submission raises concerns about the introduction of a shuttle service that could potentially increase the noise and ground tremors generated by passing trains. It notes that Dargan's Way already experiences significant noise and vibrations from the current DART service, and an increase in traffic could worsen the situation.

Response to Issue Raised

The proposed development will enable the increase in service frequency along the Howth Branch, from the current 3 trains per hour to 6 trains per hour, during peak periods. These

DART trains will be electrical multiple units (EMUs) and the potential effect of this increase in frequency, in terms of operational noise and vibration effects, has been considered in the EIAR. Chapter 14 Noise & Vibration in the EIAR details the assessment in this regard.

On the Howth Branch, the assessment assesses the potential effect of noise on sensitive receptors as negligible or minor adverse during the operational phase.

Operational vibration has also been assessed on the Howth Branch and the vibration levels expected as a result of the Proposed Development are noted as 'Not Significant'.

The Applicant notes that the potential noise and vibration effects are related to the increased frequency of service, and not by any introduction (or otherwise) of a shuttle service.

6.2.126 SB0162 – Thomas Galligan

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. It emphasises the direct services are vital to keep communities connected.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. It notes that the loss of direct services goes against the European Accessibility Act (EAA), Regulation (EU) No 1371/2007 - Rail Travel, and UN Convention on the Rights of Persons with Disabilities (CRPD).

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

The response provided under Section 2.3.1.6 herein provides a detailed response as to how the Applicant has considered potential impacts on those with a disability, the elderly and the

vulnerable throughout the design development to date. This response also details how the wider DART+ Programme (including the fleet) has considered these aspects, as well as the ongoing consultation with key stakeholders in this regard. The use of the service by disabled and other vulnerable persons is given the highest priority regarding the design of the project and wider programme.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. According to the submission, this issue is particularly pertinent to Baldoyle Road. It notes that the traffic study indicates that traffic queues on Baldoyle Road could be up to 59% longer than they currently are.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission claims that an increase in level crossings will make it difficult to access health and disability services.

Response to Issue Raised

The Applicant refers to the Traffic and Transportation chapter, Chapter 6, of the EIAR for details of the assessments completed to date. While the potential for some delays at the Howth Branch level crossings may result from the proposed increase in DART frequency on the Howth Branch, the level of impact is considered to be acceptable. The assessment concludes that the level crossings can continue to operate and provide an appropriate level of cross connectivity and accessibility whilst still meeting the increased DART service frequency requirement.

6.2.127 SB0164 – Thomas Broughan

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission highlights concerns about safety issues around Howth Junction and Donaghmede Station. The submission emphasises that there is the lack of on-site staff or security that significantly reduces people's safety.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times. It proposes alternative measures such as tunnels/underpasses to alleviate traffic issues.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.16 - Need to look at alternatives .

Chapter 6 of the EIAR 'Traffic and Transportation' has assessed the existing level crossings and has determined that they can continue to remain operational and deliver an acceptable level of service, and that alternatives such as providing grade separation at the level crossings is not necessary as a result of the current DART+ Coastal North proposals.

4. Summary of Issue Raised

The submission emphasises lessons to be learned from solutions in other European cities, such as Manchester and Tallinn. It notes that in Manchester, expanding city rail and tram systems have built tunnels and overpasses for permanent ways.

Response to Issue Raised

The Applicant appreciates the recommendation of the Observer to consider solutions implemented in other European Cities.

The inclusion of tunnels and overpasses as part of the solution to DART+ Coastal North are considered to be overly impactful on surrounding areas. Their inclusion is not considered necessary in order to deliver the aims and objectives of the project.

The DART+ Coastal North Project Team contains specialists with experience on a wide range of major infrastructure projects from around the globe. The interventions proposed by the Project have been assessed in detail by the project team and are considered to be the most appropriate interventions to deliver the objectives of DART+ Coastal North.

5. Summary of Issue Raised

The submission questions Arup's Environmental Impact Assessment Report (EIAR) for the following reasons:

- The longstanding problems at Howth Junction Donaghmede Rail and Dart station were virtually ignored in the EIAR.
- Section 4 of the EIAR provides no details on what the *"Reconfiguration"* of Howth Junction Donaghmede will entail beyond the *"removal of train crossing conflicts."*

Response to Issue Raised

The Applicant acknowledges the feedback provided by the Observer, however, it the proposed interventions are considered to be the most appropriate measures to meet the Project objectives and the EIAR that has been prepared is considered to contain all the detail of assessments required by a project of this type and scale.

With regards to issues with accessibility, facilities and security at Howth Junction and Donaghmede Station please refer to Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

Section 4.7.3.1 Proposed Howth Junction & Donaghmede Station Modifications of Chapter 4 of the EIAR provides a detailed description of the upgrades and interventions proposed at Howth Junction and Donaghmede Station.

The need for the shuttle service on the Howth Branch is expanded upon in Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

In addition to Chapter 3 Alternatives, the alternatives considered in relation to the DART+ Coastal North proposals for the Howth Branch are included in Section 2.3.1.16 - Need to look at alternatives . The Applicant believes that the assessments contained in the EIAR clearly demonstrate how the proposed Project interventions deliver the Project Objectives.

6. Summary of Issue Raised

The submission notes the number of visitors to Howth each year and concerns that the loss of the direct service to Howth would potentially have on these tourist numbers.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

6.2.128 SB0165 – Tim O’Neill, Lindsay Bond O’Neill

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development will have on existing DART users along the Howth Branch line. It notes that new developments in Howth will lead to an increased population. It emphasises that the loss of direct services could result in greater use of private vehicles, which would negatively affect the environment and raise climate concerns.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.15 - Concern around increased population in Howth.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development’s plans to use Howth Junction and Donaghmede station as an interchange point. It notes that given Irish Rail’s history with out of order lifts, this change which would require different platforms would be of detriment to people with reduced mobility, particularly those in wheelchairs and people with reduced vision, or families with small children.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission highlights concerns about anti-social behaviour around Howth Junction and Donaghmede Station. It claims that the proposal increases the risk of harm to passengers.

The submission emphasises that current safety measures, such as CCTV cameras, are insufficient, and the lack of on-site staff or security significantly reduces people's safety.

Response to Issue Raised

Refer to 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exacerbate the existing traffic congestion caused by the level crossing barrier closing times. This would primarily affect public, private, and, most importantly, emergency services.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.7 - Impact on Emergency services.

5. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development would have on local businesses and the tourism industry in Baldoyle, Sutton, and Howth. The dual effects of increased traffic congestion and the potential loss of leisure travellers, particularly to Howth, are highlighted as significant issues.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

6. Summary of Issue Raised

The submission claims that the loss of direct connectivity to Dublin City is likely to result in increased inconvenience for commuters. It mentions that the disruption to the DART line could deter tourists or force them to use cars instead of the DART. Additionally, it emphasises that the Proposed Development would cause work-life balance disruptions due to increased travel time.

Response to Issue Raised

The Applicant acknowledges the concerns related to increased travel times. These have been considered within the context of the Project. While travel times will potentially be increased

during periods where the shuttle is in operation, linked to the need to interchange at Howth Junction and Donaghmede Station, these increases are offset by the benefits of the increased frequency of service and improved levels of reliability that will be delivered by DART+ Coastal North.

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.11 - Impact on Tourism.

6.2.129 SB0166 – Cllr. Tom Brabazon

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises concerns about the impact the Proposed Development will have on existing DART users along the Howth Branch line. It emphasises that the loss of direct services would lead to increased use of private vehicles, which could negatively affect the environment and raise climate concerns.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission raises concerns about the significant impact of the Proposed Development on the tourism industry in Howth and Sutton. It emphasises that the increased traffic will deter people from traveling to Howth, causing them to spend their disposable income in less congested areas.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

4. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion caused by the level crossing barrier closing times.

It proposes underpasses underneath the railway for vehicular traffic.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.16 - Need to look at alternatives .

Chapter 6 of the EIAR Traffic and Transportation has assessed the existing level crossings and has determined that they can continue to remain operational and deliver an acceptable level of service, and that alternatives such as providing grade separation at the level crossings is not necessary as a result of the current DART+ Coastal North proposals.

5. Summary of Issue Raised

The submission calls for an economic impact assessment, particularly focused on the Howth Peninsula, to investigate how it might affect employment in the area.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

Further economic assessments are not considered to be necessary as part of the DART+ Coastal North Project proposals.

6. Summary of Issue Raised

The submission calls for Oral Hearing.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

7. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on local businesses.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

8. Summary of Issue Raised

The submission notes that the platform proposed at Donaghmede/Howth Junction is not large enough. It highlights that any glitches in the system could cause the platform to become overcrowded and dangerous.

Response to Issue Raised

The concerns raised regarding platform size and passenger safety at Howth Junction & Donaghmede Station have been carefully considered.

A detailed capacity assessment was carried out to evaluate the impact of altered passenger flows due to changes in train arrival and departure patterns.

The results indicate that certain areas, including the width of existing stairs, bridge deck, and Platform 2, exhibit constraints on passenger flow in accordance with the Network Rail Station Capacity Planning Guidance. These constraints represent slowed passenger movement rather than outright overcrowding.

The station was also assessed for a Perturbation scenario, which evaluates pedestrian movement under restricted circulation conditions.

The assessment confirms sufficient space on all platforms for the expected passenger numbers, with a noted constraint on Platform 2 during the AM peak. This analysis assumes the use of the full platform width, from the yellow line to the rear of the platform, for circulation.

To address the constraint on Platform 2, the platform width will be increased to 4 metres, removing the identified bottleneck.

The platform length will also be extended by 64 metres, improving passenger flow and circulation.

Existing Overhead Line Equipment (OHLE) masts will be replaced with new headspan masts positioned beyond the back of the proposed platform to maintain maximum clear width.

A new emergency evacuation route will be provided, as recommended by the fire assessment report, to enhance passenger safety.

Constraints at the bridge deck and stairs will be mitigated through planned upgrades to both station entrances.

Additionally, a new central connection will be provided, significantly improving accessibility and passenger flow, as detailed in Sections 4.7.3.1.3 to 4.7.3.1.6.

The proposed improvements comprehensively address the constraints identified in the capacity assessment. By widening and extending Platform 2, replacing OHLE masts to maximise platform width, and introducing an emergency evacuation route, the platform will safely accommodate expected passenger volumes, even during peak times. Moreover, enhancements to the bridge deck, stairs, and station entrances will further alleviate constraints, ensuring a safe and efficient passenger experience.

9. Summary of Issue Raised

The submission emphasises the lack of public consultation, noting that a single meeting in Sutton was insufficient.

Response to Issue Raised

IE has worked hard to communicate widely and clearly with the general public, throughout the Project development thus far, including two non-statutory public consultation periods, as described in the PC1 and PC2 Findings Report submitted with the Railway Order application.

As part of the communication strategy, A Community Liaison Officer (CLO) has been available to engage with anyone seeking information relating to the DART+ Coastal North Project, and a CLO will be appointed and remain in place for the duration of the Project. The CLO will be in place to communicate with residents and impacted parties, and to address any concerns that may be raised in relation to the Project going forwards.

6.2.130 SB0167 – Tommy and Rosemary Drumm, Michael and Lisa Hickey

Representative: Raymond O'Malley of Kieran O'Malley + Co. Ltd Town Planning Consultants

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission objects to the removal of a direct service and claims that the level of shuttle service to be provided is unclear. It also mentions that the operational timetable is vague and therefore unacceptable.

Response to Issue Raised

Refer to:

- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity and
- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.

2. Summary of Issue Raised

The submission questions how an Environmental Impact Assessment (EIA) can be conducted with this level of “*uncertainty*”.

Response to Issue Raised

In the first instance, it is noted that An Bord Pleanála is the competent authority and will undertake the EIA and will reach a reasoned conclusion as to the significance of effect of the Proposed Development on the environment as part of the decision-making process for the Railway Order application.

The EIAR has been prepared in accordance with the requirements of the EIA Directive, national legislation and all relevant best practice guidance, as detailed in Chapter 1 Introduction of the EIAR. As set out in Chapter 1 of the EIAR, the EIAR has been prepared “*by competent experts, with appropriate expertise to provide informed assessment on the environmental factors as required under the EIA Directive. The EIAR consists of a systematic analysis and assessment of the potential effects of a Proposed Development on the receiving environment.*”

Section 1.5.2 of Chapter 1 of the EIAR sets out the information required in order to satisfy the requirements of the EIA Directive (and any transposing legislation). The Applicant has met these requirements in preparing the EIAR.

The EIAR (and in particular Chapter 4 Description of the Proposed Development and Chapter 5 Construction Strategy of the EIAR) together with the detailed drawings accompanying the Railway Order application, provide full details (as per the EIA Directive and relevant legislation) to ensure that a comprehensive assessment of the significance of effect of the Proposed Development could be undertaken.

As detailed in Chapter 4 Description of the Proposed Development, the DART+ Coastal North Project is primarily an infrastructure project. The infrastructural changes proposed will enable an increase in capacity and frequency and service in line with the Train Service Specification (TSS1C). The TSS1C is best illustrated in Image 4-2 in Chapter 4 Description of the Proposed Development in the EIAR.

With particular reference to the Howth Branch, the Proposed Development will enable an increase in the frequency of service from the current 3 trains per hour per direction during peak periods, up to 6 trains per hour per direction in the future. This level of service will

increase over time as demand increases. However, a reasonable worst case (i.e. when the maximum frequency of 6TPHPD is realised) has been assessed, in accordance with the requirements of the EIA Directive. To that end, while the future operational timetables have not yet been developed, there is certainty as to the significance of effect of the Proposed Development, as the reasonable worst case has been assessed.

3. Summary of Issue Raised

The submission raises concerns about train capacity and overcrowding, particularly when interchanging at Howth Junction and Donaghmede stations.

Response to Issue Raised

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission requests for 6 direct services per hour from Howth and to maintain direct services to Howth to support sustainable transport, land use planning and climate change justification.

Response to Issue Raised

In order to facilitate the maximum level of service on the Northern Line and Howth Branch, at certain times it will be necessary to operate a shuttle on the Howth Branch.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals and
- Section 2.3.1.15 - Concern around increased population in Howth.

6.2.131 SB0170 – Valerie McLoughlin, Eimear Cremin, Ann Faherty, Maire Garvey, Ann Gormley, Susan Hawkins, Suzanne Hogan, Emer Kirwin, Alice Kenny, Margaret Lamont, Marese McKiernan, Brenda Murphy, Lorraine Ni Ghairbhith, Edie O’Neil, Geraldine Regan, Eileen Staunton, Rachel Wolfson

Representative: Valerie McLoughlin

Submission Location – Howth, Sutton, Raheny, Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission generally supports the DART+ Coastal North concept. However, it raises concerns that residents of the Howth Peninsula are being asked to accept a downgraded service to benefit communities along the northern line.

Response to Issue Raised

The Applicant acknowledges the support of the DART+ Coastal North Project by the Observer and notes its appreciation.

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.18 - Concerns of the people of Howth being taken into account.

2. Summary of Issue Raised

The submission raises concerns in respect of the impact on businesses (restaurants/pubs/care homes and care staff access private homes). It also raises concerns about the impact on tourism.

Response to Issue Raised

Refer to:

- Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service and
- Section 2.3.1.11 - Impact on Tourism.

3. Summary of Issue Raised

The submission raises concerns about traffic congestion due to longer level crossing closure times, which are linked to the increased frequency of services on the Howth Branch. It also notes that other forms of public transport, such as buses, will be negatively impacted by the more frequent and prolonged level crossing closures.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

4. Summary of Issue Raised

The submission expresses concerns that the Proposed Development may impact Sustainable Transport goals. It highlights the loss of direct DART services as a factor that could drive people back to using private cars, which would negatively affect alignment with national transport and climate policies and goals.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

Summary of Issue Raised

The submission highlights accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. It claims that the

proposed plan will negatively impact people traveling with small children, individuals with disabilities, those with limited mobility, the elderly, and wheelchair users. The submission expresses concerns about the reliance on lifts at the station, given the history of lift issues at stations and the challenges of navigating between platforms.

The submission cites UN Sustainable Development Goal 11 about “making cities and human settlements inclusive, safe, resilient and sustainable”; in particular the goal under Transport: By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons. The submission asserts that DART+ Coastal North is in breach of this UN goal.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission highlights a lack of clarity regarding the proposed upgrades at Howth Junction & Donaghmede Station. It also notes uncertainty about future timetables and the operation of the shuttle service. The submission requests clarification on when the decision to operate the shuttle will be made.

Response to Issue Raised

The Applicant disputes the claim that the proposals for the upgrades to “Howth Junction & Donaghmede Station are vague & ambiguous”. Details of the proposals are clearly set out in Section 4.7.3.1 of Chapter 4 of the EIAR Proposed Howth Junction & Donaghmede Station Modifications.

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
- The people of Howth require clarity

6. Summary of Issue Raised

The submission raises concern with potential impacts on tourism in Howth, linked to the loss of a direct service from Dublin.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

7. Summary of Issue Raised

The submission raises concerns about the potential impact of increasing population numbers in the Howth area on traffic. It also claims that the EIAR does not take this population growth into account.

Response to Issue Raised

Refer to Section 2.3.1.15 - Concern around increased population in Howth.

8. Summary of Issue Raised

The submission expresses concern about the impact of traffic congestion at the level crossings along the Howth Peninsula, linked to the increased frequency of DART services.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

6.2.132 SB0171 – Vincent Wallace

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact of the loss of direct DART services will have on the existing DART users along the Howth Branch line. It notes that this will result in increased journey times and delays for commuters traveling to and from Howth.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

2. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. The proposed changes would require the use of stairs or lifts to access the new Howth shuttle train. It notes the concerns over the viability of lifts as a reasonable alternative given a history of maintenance issues across the network.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

3. Summary of Issue Raised

The submission raises concerns about whether the upgrades at Howth Junction & Donaghmede Station are sufficient to accommodate the volume of commuters needing to interchange during peak times. It also highlights concern about a possible shortage of seating and capacity on connecting trains, which could lead to overcrowded platforms.

Response to Issue Raised

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission requires at least two direct services to be maintained to encourage commuters to use public transport.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service.
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
 - The people of Howth require clarity

5. Summary of Issue Raised

The submission raises concerns over the potential impact on Howth Tourism.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism.

6.2.133 SB0172 – Wendy Fagan

Representative: n/a

Submission Location – Sutton (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. It claims that the direct DART services from Howth, Sutton and Bayside are “vital to keep communities connected”. The submission

notes that the loss of direct services to Dublin City Centre could potentially shift in rail commuters back to private car use.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service, and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede station.

2. Summary of Issue Raised

The submission expresses concern about the increased frequency of closures at the Howth Branch level crossings. It highlights the potential impacts of these closures on traffic and queuing at the level crossings on the Howth Peninsula. Additionally, it raises concerns about the broader impact on traffic and the road network due to the increased wait times and resulting congestion.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission raises concerns about the negative impacts on sustainable travel and the general misalignment of DART+ Coastal North with national transport and climate policies.

Response to Issue Raised

Refer to Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

4. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development's plans to use Howth Junction and Donaghmede station as an interchange point. It notes that the proposed changes would require the use of stairs or lifts to access the new Howth shuttle train that will cause difficulties for people with disabilities, limited mobility, and wheelchair users, given Irish Rail's history with out of order lifts.

Response to Issue Raised

Refer to:

- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics, and
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

5. Summary of Issue Raised

The submission highlights that the loss of direct DART services will significantly impact local businesses in Baldoy, Sutton, and Howth. It emphasizes that businesses will face delays in deliveries and longer journey times for both staff and customers.

Response to Issue Raised

Refer to Section 2.3.1.8 - Impact on Local Businesses from the loss of direct service.

6. Summary of Issue Raised

The submission calls for An Bord Pleanála to hold an Oral Hearing for the DART+ Coastal North planning application.

Response to Issue Raised

Refer to Section 2.2.2 - Request for Oral Hearing.

6.2.134 SB0173 – William Quinn

Representative: n/a

Submission Location – Howth (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission claims that current redevelopment plans for Howth Junction and Donaghmede Station are vague and ambiguous.

Response to Issue Raised

The Applicant disputes the claim that the proposals for the upgrades to “Howth Junction & Donaghmede Station are vague & ambiguous”. Details of the proposals are clearly set out in Section 4.7.3.1 of Chapter 4 of the EIAR Proposed Howth Junction & Donaghmede Station Modifications.

Section 2.3.1.6 also details the proposed upgrades to the Howth Junction & Donaghmede Station which will both improve the passenger experience generally and develop the station to better serve as an interchange station into the future. This includes for example (and addressing specific concerns raised in some of the submissions) the provision of additional shelter on the platforms for those who might be interchanging in the future.

2. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. It claims that the “shuttle service” will significantly extend journey times for passengers traveling from the Howth Branch. It claims that the “shuttle service” will significantly extend journey times for passengers traveling from

the Howth Branch. Additionally, the submission highlights concerns regarding the “poor punctuality” and “reliability” of Irish Rail, which could further affect journey times.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

With regards to “poor punctuality” and “reliability” the Applicant notes that the proposed interventions included in DART+ Coastal North will result in a more reliable and resilient service on the Northern Line and Howth Branch through the provision of additional turnbacks, passing loops and the introduction of a shuttle service on the Howth Branch.

3. Summary of Issue Raised

The submission claims that there would be accessibility issues related to the Proposed Development’s plans to use Howth Junction and Donaghmede station as an interchange point. The submission claims that the shuttle service “discriminates” against vulnerable groups, such as wheelchair users and elderly passengers, by requiring transfers at an understaffed and inadequately equipped Howth Junction station.

Response to Issue Raised

Refer to Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable.

4. Summary of Issue Raised

The submission highlights concerns about passenger safety and anti-social behaviour around Howth Junction and Donaghmede station. It claims that the proposed plan “fails” to address these safety issues adequately. The report indicates that insufficient security measures at Howth Junction, combined with a lack of staffing, will deter passengers from using the service and create unsafe conditions.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

5. Summary of Issue Raised

The submission includes its concern with the use of Howth Junction and Donaghmede as it is exposed to the weather. It raises the fact that the plans for the Proposed Development do not include the provision of shelter improvements for passengers waiting on the middle platform of the station.

Response to Issue Raised

Section 2.3.1.6 details the proposed upgrades to the Howth Junction & Donaghmede Station which will both improve the passenger experience generally and develop the station to better serve as an interchange station into the future. It is noted that these upgrades do include for the provision of additional shelter for passengers within the station.

6. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion at Sutton Cross and Strand Road caused by the level crossing barrier closing times.

Response to Issue Raised

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

7. Summary of Issue Raised

The submission highlights that worsened traffic congestion at Sutton Cross and Strand Road could pose a serious to the accessibility of the emergency services to the area, particularly during peak times or weekends.

Response to Issue Raised

Refer to Section 2.3.1.7 - Impact on Emergency services.

8. Summary of Issue Raised

The submission indicates that prolonged level crossing closures will lead to increased congestion, resulting in higher CO2 emissions and thereby undermining the Project's stated sustainability objectives.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.5 - Impact on Climate Policies/Sustainable Travel goals.

9. Summary of Issue Raised

The submission calls for some direct DART services be maintained during peak hours to reduce journey times and preserve community connectivity.

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service and
- Section 2.3.1.17 - Concerns over a lack of clarity over when the Shuttle will be operated
 - The people of Howth require clarity.

6.2.135 SB0175 – Yvonne Kelly

Representative: n/a

Submission Location – Baldoyle (Relevant to Howth Branch)

1. Summary of Issue Raised

The submission raises their concerns on the impact the Proposed Development will have on the existing DART users along the Howth Branch line. The submission emphasizes the importance of the direct DART service from Howth to Dublin for maintaining “convenience” and the strong connection between communities, particularly for family members and residents reliant on the service.

The submission, furthermore, raises issues in respect of the danger for many having to change at Howth Junction and accessibility for those with disabilities (impaired vision, mobility issues, elderly etc).

Response to Issue Raised

Refer to:

- Section 2.3.1.1 - Concern over removal of direct service / Lack of a Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics,
- Section 2.3.1.6 - Need for Interchange - accessibility and impacts on those with a disability, the elderly and vulnerable and
- Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station.

2. Summary of Issue Raised

The submission raises concerns over the effect the Proposed Development would have on the tourism industry, as Howth is a major tourist attraction that hosts vibrant food festivals and provides direct access to Burrow Beach. In the submission it claims that the disruption to the DART line would negatively affect visitor numbers and participation. The submission refers to a right of way to Burrow Beach being negatively impacted by the DART+ Coastal North proposals.

Response to Issue Raised

Refer to Section 2.3.1.11 - Impact on Tourism

The Applicant acknowledges the potential for increased frequency of level crossing closures as DART+ Coastal North builds towards maximum capacity. The Applicant acknowledges that access to Burrow Beach across Cosh Level Crossing will be affected by this increase in closure frequencies. While the frequency and duration of level crossing closures is expected to increase as a result of DART+ Coastal North, the level crossings have been assessed in Chapter 6 of the EIAR and are considered to still provide an acceptable level of cross rail connectivity in the future case.

Refer to Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic.

3. Summary of Issue Raised

The submission highlights the importance of strong transport links from the Howth/ Sutton areas to Dublin City Centre as the population in these areas continue to grow. It expresses the concern that the narrow isthmus at Sutton Cross cannot accommodate more traffic, making DART essential.

The submission refers to a number of planning permissions that have been granted in recent times (Howth Castle, Hill of Howth, Santa Sabina). It is suggested that the decision to grant planning permission in respect of those developments was grounded (in part) on the DART between Howth and Dublin. The impact on these developments needs to be considered.

Response to Issue Raised

The Applicant will deliver the DART+ Coastal North Project with a view to further strengthening the existing public transport links to and from Howth along the Howth Peninsula by seeking to double the service frequency and capacity of services on the Howth Branch. By doubling the frequency of service and improving the overall reliability of services the DART+ Coastal North Project seeks to encourage a modal shift and reduce the volume of private cars passing through areas such as Sutton Cross as referred to in the submission.

Refer to:

- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede Station and
- Section 2.3.1.15 - Concern around increased population in Howth.

4. Summary of Issue Raised

The submission notes its concerns regarding Anti-Social Behaviour and “potential safety concerns” for commuters around Howth Junction and Donaghmede station, particularly for those traveling from Baldoyle, Bayside, and Sutton.

Response to Issue Raised

Refer to Section 2.3.1.12 - Security & Anti-social Behaviour concerns at Howth Junction & Donaghmede Station

5. Summary of Issue Raised

The submission claims that the Proposed Development would further exasperate the existing traffic congestion at Sutton Cross, a narrow and already overburdened access point.

Response to Issue Raised

Refer to:

- Section 2.3.1.3 - Impact on Level Crossings/ Increased wait times/Increased Traffic and
- Section 2.3.1.14 - Increased traffic due to people choosing to drive rather than use interchange at Howth Junction & Donaghmede Station.

6. Summary of Issue Raised

The submission highlights that the Bray-Howth connection is acknowledged as an integral part of Ireland's heritage, promoting family visits and preserving cultural continuity. Altering this connection would significantly reduce its value. The submission suggests studying the Howth Tramway proposal made to Fingal County Council in 2016, incorporating it into the DART+ plan to preserve and enhance local heritage while boosting transport options.

Response to Issue Raised

As noted in Section 2.3.1.1, the Applicant would like to make clear that the enhancement of the service on the Howth Branch will likely include a combination of a direct service to the city centre and a DART shuttle service between Howth and Howth Junction & Donaghmede Station during periods when this is required to deliver increased frequency of services.

The existing DART link between Bray and Howth shall remain available to commuters, with a greater frequency of services available to passengers wishing to make this commute in future, and this may include a need to interchange between Northern Line Services and a shuttle on the Howth Branch when operationally required.

It is the understanding of the Applicant that the Local Authority is not looking to progress with the development of a Howth Tramway at the current time.

6.3 Zone C

6.3.1 SB0013 – Balbriggan Football Club

Representative: Kevin Tolan, KT Designs

Submission Location – Balbriggan

1. Summary of Issue Raised

The submission states *“Balbriggan Football Club have their clubhouse & grounds located adjacent to the Railway Line and these are shown on Works Layout Plan No.17. it is noted that there is no land acquisition required from Balbriggan FC either temporary or permanent and we trust this situation will not change without prior discussion and agreement with representatives of Balbriggan FC.”*

Response to Issue Raised

The Applicant confirm there is no intention to permanently acquire lands from Balbriggan FC as part of the DART+ Coastal North Project and no permanent acquisition is included in the Railway Order application.

Temporary acquisition of land is required, comprising *“Land of which temporary possession may be taken – Schedule 3”* and *“Land over which Private Rights of Way or Other Easements may be acquired – Schedule 4 Part 1”*. These lands have been referenced in the Railway Order application to carry out the decommissioning and removal of the existing overhead low voltage (LV) power lines by ESB Networks to accommodate the installation of a new underground low voltage power line as a diversion to facilitate the removal of existing overhead services by ESB.

The requirement for temporary acquisition of land is set out in the landowner pack you would have received at the time of the Railway Order application submission, for land plot IPID 416. This sets out all the details associated with the proposed land acquisition.

2. Summary of Issue Raised

The submission states that *“on ‘Server Map Plan No.DCN-SM-001117-5028’ there is an area of land (Fingal County Council ownership) marked as a ‘right-of-way to be acquired’. This is adjacent to Bath Road and appears to be where there is currently a pedestrian walkway which is used by people to access Balbriggan FC and also by members of the Community out walking. We trust that a replacement footpath will be provided should the existing one need to be acquired as part of the Dart+ works.”*

Response to Issue Raised

The area identified on server map DCN-SM-001117-5028, referred to in the submission, relates to works required to remove a conflict between the proposed new overhead electrical infrastructure (OHLE) associated with the extension of the DART to Drogheda and existing

overhead LV ESB cables. The works include the decommissioning and removal of the existing overhead low voltage (LV) power lines by ESB Networks to accommodate the installation of a new underground low voltage power line as a diversion to facilitate the removal of existing overhead services.

The works will be carried out at some point in the future by ESB Networks subject to the DART+ Coastal North Project securing all necessary statutory approvals and funding. Further information on the methodology involved in LV ESB diversions can be found in section 5.3.4.4 of Chapter 5 of the EIAR.

It is expected that the works associated with the proposed ESB diversion (above) will impact on the existing footpath referred to in the submission. The works are expected to be completed in a relatively brief period, by ESB Networks, and the existing footpath will be fully reinstated further to the completion of the ESB diversion.

3. Summary of Issue Raised

The submission states its support for the DART+ Coastal North Project and states *“Balbriggan FC encourages our members to walk & cycle to their home games and with the additional frequency of trains when the Dart hopefully arrives in Balbriggan, perhaps it will be feasible for football players, coaches & supporters from eg. Malahide or Donabate to take the Dart to their matches in Balbriggan and vice versa, hence reducing people's reliability on & use of cars”*.

Response to Issue Raised

The Applicant acknowledges and welcomes the support of Balbriggan FC for the Proposed Development.

6.4 Zone D

There were no other submissions received from Zone D.

6.5 Zone E

6.5.1 SB0009 – Anthony Grey

Representative: n/a

Submission Location – Wheaton Hall, Drogheda

1. Summary of Issue Raised

The submission raises concerns with regards to the scope of the DART+ Coastal North Project, noting that in the view of the submitter the Project fails to provide the critical transformation needed for the Dublin/Drogheda rail corridor and offer limited benefits to specific group users in the areas of North Dublin, East Meath and Louth. The submission notes

a degradation of service offering for other commuters (Howth Branch) in the delivery of what are considered minimalist and inadequate benefits to the Northern Line.

Response to Issue Raised

Chapter 2 of the EIAR sets out the Policy Context and Need for the Project. The Need for the Project is as described in section 2.4 and the Project objectives are set out in section 2.6.

The infrastructural interventions proposed as part of the DART+ Coastal North Railway Order application are considered appropriate to allow for the delivery of the Project objectives which have been agreed by the NTA and align with current Government, European, and National policy.

The submission continues to raise concerns which fall outside of the Project scope, many of which may be addressed as part of other Iarnród Éireann projects, subject to direction being received from the NTA to progress such projects. Chapter 4 of the EIAR clearly defines what is included in the scope and objectives for DART+ Coastal North – additional infrastructural interventions or upgrades are not precluded by the Project proposals but equally are not considered to be necessary in order to deliver this important infrastructure project.

2. Summary of Issue Raised

The submission raises concerns relating to existing capacity constraints which are noted to be unaddressed by DART+ Coastal North and also notes limited capacity increases proposed for areas in closer proximity to Dublin City Centre where the potential for increased frequency is limited by existing track infrastructure.

- The proposals do not increase track capacity or significantly improve passenger throughput during peak hours and the existing twin-track infrastructure restricts train frequency to 12 trains per hour between Connolly and Malahide.
- The submission acknowledges the increases in passenger capacity that will be achieved through the introduction of the new DART fleet, and the extension of DART services to 8-car units and the extension of the peak travel periods to 3hrs but cites limited capacity increases

Response to Issue Raised

The existing constraints to further increases in DART frequency and capacity between Howth Junction & Donaghmede Station and Dublin City Centre are acknowledged by the Applicant. The section of track between these 2 stations is limited to 12 trains per hour per direction.

In order to maximise the capacity of the Northern Line and Howth Branch the DART+ Coastal North Project proposes new turn back infrastructure at Howth Junction & Donaghmede, Clongriffin, Malahide and Drogheda MacBride Stations, as well as operating a shuttle service on the Howth Branch during peak periods. These infrastructural interventions, and other works as described in Section 4 of Chapter 4 of the EIAR will facilitate the increases in DART

frequency and capacity that are indicated in Image 4-2 (in Chapter 4) Service capacity increases during AM peak period.

Refer to:

- Section 2.2.21 - Long-term Planning in public transport strategies and land use planning, and
- Section 2.2.22 - Issues with existing congestion and resilience of the Northern Line (calls for further interventions).

3. Summary of Issue Raised

The submission notes that commuters from Howth, Sutton & Bayside may struggle to board receiving trains at Howth Junction & Donaghmede. The submission refers to a potential for overcrowding and passenger challenges at Howth Junction & Donaghmede station.

Response to Issue Raised

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

4. Summary of Issue Raised

The submission raises concern over the impact of DART+ Coastal North on other services operating on the Northern Line, particularly in relation to Intercity and Enterprise services which will see their journey times impacted.

Response to Issue Raised

Refer to Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

5. Summary of Issue Raised

The submission provides commentary on a variety of the infrastructural interventions proposed by the Project. The need for the proposed interventions at Howth Junction is questioned by the submission.

Response to Issue Raised

The proposed interventions at Howth Junction are set out in Chapter 4 of the EIAR, section 4.7.3.1 Proposed Howth Junction & Donaghmede Station Modifications, and include track and platform modifications to the East of the station, and the upgrades to the station itself to ensure it is fit for the purpose of acting as an interchange station going forwards.

The proposed track works include the provision of a new turnback facility that is required to meet the increased level of service specified in the Train Service Specification (TSS). The new turnback at Howth Junction & Donaghmede Station consists of a new crossover which is

located east along the Howth Branch line between the Up and Down Branch lines as per Image 4-30, in Chapter 4 of the EIAR. Minor adjustments to the track geometry along the Branch lines are required to achieve the design speed of the proposed new turnback. The track and platform interventions proposed are required to facilitate the introduction of a shuttle service on the Howth Branch. Without these interventions, DART services the proposed increases on the Northern Line cannot be delivered. It is also important to note that the capacity increases proposed by DART+ Coastal North will not be implemented immediately upon completion of the Project. Future timetables will build on existing capacity based on future passenger demand into the future.

The investment proposed in Howth Junction & Donaghmede Station is largely as a direct result of feedback received during PC1. A variety of significant modification works are proposed at the station to both improve the passenger experience generally, and to develop the station to better serve as an interchange station going forward. The works will involve modifying the station entrances to provide a more accessible, user friendly and customer focused station for all rail users, as well as improving the connection to the surrounding areas of Donaghmede and Kilbarrack. The works will include upgrades to the existing footbridge, connections to the centre platforms, the provision of additional sheltered areas along platforms, as well as general improvements to lighting, signage, and finishes throughout.

The need for interchanging between services is set out in Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

6. Summary of Issue Raised

The submission welcomes the interventions at Clongriffin but refers to previous submissions where the extent of intervention in this location are considered insufficient. The submission proposes that a passing loop be extended by a length of 1km to the North towards Portmarnock to provide additional opportunities for passing of DART services by the Enterprise and/or Intercity services.

Response to Issue Raised

While the Applicant acknowledges the potential benefits suggested in the submission, the possible extension of the passing loop beyond the extents proposed in the Railway Order application are not considered to be necessary for DART+ Coastal North to deliver its project objectives.

The addition of passing loops at certain locations is not something that will be precluded by the DART+ Coastal North Project and should the need arise for such interventions in the future they may be progressed by Iarnród Éireann as part of separate projects.

Refer to Section 2.2.22 - Issues with existing congestion and resilience of the Northern Line (calls for further interventions).

7. Summary of Issue Raised

The submission proposes that Malahide is an inappropriate location for a turn-back given the physical limitations of the site and the fact that there is so much new development in Donabate. The submission also proposes that Donabate Station and the track between Donabate and Malahide should be electrified in advance of DART+ Coastal North.

Response to Issue Raised

Iarnród Éireann operate a mixed traffic type of service on the Northern Line – DART trains calling at every station, commuter trains which tend to operate nonstop from Malahide or Portmarnock to the city centre and, the nonstop enterprise service operating between Dublin and Belfast. In the absence of having a four-track solution to separate these traffic types, moving the turnback location further north of the proposed turnback at Malahide would result in an increased negative impact on the journey times of commuter & enterprise services.

Furthermore, due to the increased running distances involved, additional trainsets would be required to deliver the proposed level of service, were the proposed turnback located at Donabate rather than at Malahide.

In addition to the above, Malahide Station is already an established interchange location for passengers wishing to change from a commuter service coming from Dundalk or Drogheda for those passengers travelling to DART stations located between Malahide & the city centre.

The electrification of the line between Malahide and Donabate, or any other stretch of the Northern Line in advance of DART+ Coastal North, due the potentially locating a turnback at Donabate, does not fit within the scope or objectives of the Project and will not be progressed.

8. Summary of Issue Raised

The submission calls for additional interventions, such as passing loops, to be included at Skerries, Balbriggan and Mosney, in addition to those interventions currently proposed by DART+ Coastal North.

Response to Issue Raised

The Applicant acknowledges the possible potential benefits associated with the inclusion of additional infrastructure such as those proposed in the submission. However, these additional interventions are not necessary for DART+ Coastal North to deliver its project objectives.

As previously noted, the Project will not preclude the introduction of these types of infrastructure and should the need arise, they may be progressed as part of future Iarnród Éireann projects.

9. Summary of Issue Raised

The submission notes the missed opportunity to utilise the former cement factory marshalling yard to provide a Drogheda North Park & Ride and transport hub which could be located just off the main line at Newfoundwell.

This is noted as a development which could serve the north of Drogheda and much of South Louth.

Response to Issue Raised

The strategy for the provision of any additional new stations and other rail infrastructure interventions beyond the current extents of DART+ Coastal North is a matter for the National Transport Authority (NTA).

The design of the Project will be compatible with any future extensions and/or additional links/branches that may be added to the Northern Line as part of any future Iarnród Éireann projects. The current proposals will not preclude any future developments such as an extension of DART+ Coastal North beyond its current extents.

Refer to Section 2.2.6 - Calls for Additional Stations.

10. Summary of Issue Raised

The submission notes a lack of information with regards to future timetables and journey times for future DART+, Intercity and Enterprise services.

Response to Issue Raised

The proposed interventions included in DART+ Coastal North are to enable a higher frequency and capacity of service on the Northern Line and Howth Branch. The service requirements of the Project are to meet the Train Service Specification of TSS1C which the Project will achieve with the proposed interventions.

The assessments and modelling have confirmed that the Project can deliver the service frequency and capacity required. How the Project builds towards this maximum level of frequency and capacity is however a matter for future timetables to address. The development of future timetables will be based on future commuter requirements, and it is unlikely that the maximum level of service will be introduced in one single timetable change and will instead be built up to in incremental steps over time. Each significant change to future timetables will be subject to their own public consultations, organised by the NTA, separate to DART+ Coastal North.

Refer to:

- Section 2.2.19 - Impact on Intercity/Enterprise Trains and
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics.

11. Summary of Issue Raised

The Submission includes copies of submissions which were made during PC1 & PC2.

Response to Issue Raised

Many of the key points raised in the submissions received in PC1 and PC2 are addressed above, and/or through the publication of PC1 and PC2 Findings Reports which sought to address queries and recommendations as part of the design development process (Appendix 3.1 and 3.2 of the EIAR).

6.5.2 SB0011 – Aoife McKinnon

Representative: n/a

Submission Location – Wheaton Hall, Drogheda

1. Summary of Issue Raised

The submission expresses objection to the DART+ Coastal North Railway order application and notes concern over the considerable works needed for upgrade of line and notes that ABP should refuse planning based on the level of disruption to residents in the surrounding area.

Response to Issue Raised

The Applicant acknowledges the objection expressed in the submission.

With regards to the “*considerable works needed for upgrade of the line*” the submitter’s attention is drawn to Chapter 5 of the EIAR which describes in detail the proposed construction strategy of the DART+ Coastal North Project.

Chapter 5 describes the construction programme, phasing, and methodology for the proposed DART+ Coastal North Project, referred to hereafter as “*the Proposed Development*.” The chapter should be read in conjunction with Chapter 4 (Description of the Proposed Development), in Volume 2 of the EIAR, which gives a detailed description of the Proposed Development and with the technical design drawings and figures included in Volume 3A of the Environmental Impact Assessment Report (EIAR).

Appendix A5.1 provides a Construction Environmental Management Plan (CEMP). The CEMP applies to all works associated with the Proposed Development. As a contractor has not yet been appointed, this CEMP has not been formally adopted and further development and commitment to the CEMP will be undertaken following selection of Contractors and before commencement of site works. The CEMP presents the approach and application of environmental management and mitigation measures for the Construction Phase of the Proposed Development. It aims to ensure that adverse effects from the Construction Phase of the Proposed Development, on the environment and the local communities, are avoided or

minimised as far as reasonably practicable. It does not describe mitigation measures relating to the Operational Phase and any future decommissioning of the Proposed Development. These are provided in the mitigation sections of the EIAR Chapters in Volume 2 of the EIAR and are summarised in Chapter 27 (Summary of Mitigation and Monitoring Measures).

The CEMP provides the environmental management framework for the appointed Contractors and sub-contractors as they incorporate the mitigating principles to ensure that the work is carried out to reduce adverse effects on the environment. The construction management staff as well as contractors and sub-contractors' staff must comply with the requirements and constraints set out in the CEMP in developing the finalised CEMPs. The key environmental aspects associated with the construction of the DART+ Coastal North Project, the appropriate mitigation and monitoring controls, are identified in this CEMP and its supporting documentation. The implementation of the requirements of the CEMP will ensure that the Construction Phase of the Project is carried out in accordance with the commitments made by CIE/IE in the Railway Order application process for the Proposed Development, and as required under the Railway Order. Once commenced, the CEMP is considered a living document that will be updated according to changing circumstances on the Project and to reflect current construction activities. The CEMP will be reviewed on an ongoing basis during the construction process and will include information on the review procedures.

2. Summary of Issue Raised

The Submission expresses concern that residents near rail line have experienced noise disruption and loss of privacy for years and that an increase of traffic on the line will exacerbate the issues of noise disturbance, loss of privacy, and additional pollution.

Response to Issue Raised

1. Noise Disturbance

Chapter 14 of the EIAR assesses the likely significant noise and vibration effects of the proposed DART+ Coastal North Project.

2. Operational Noise

Details on the predicted noise from the operational phase of the proposed Project is presented in Section 14.3.11 of the EIAR.

The metric used in noise assessments is LAeq, a weighted equivalent sound energy over a time period. The LAeq metric includes both the sound level and the duration of the sound in order to account for the intermittent nature of rail noise.

Although there will be an increase in the LAeq noise levels over a 16-hour daytime period and 8-hour night-time period at some noise sensitive locations (due to more and longer trains during the period), it is worthwhile noting that the introduction of EMUs will not increase the peak noise level experienced at noise sensitive locations when each train passes by, as the new trains are quieter than the existing diesel trains.

Where increases in noise levels as a result of the Proposed Development have been identified, noise sensitive locations have been assessed against the noise mitigation criteria outlined in Section 14.3 of the EIAR. The outcome of the mitigation assessment and proposed mitigation measures are presented in Section 14.6.2.

3. Construction Noise

A detailed description of the proposed construction works, and phasing is outlined in Chapter 5 Construction Strategy of the EIAR.

It is acknowledged that short-term increases in noise impacts in certain areas will occur during the construction phase of the proposed Project due to the requirement to use heavy plant and machinery. Section 14.6.1 of the EIAR identifies general mitigation measures that will be implemented during construction works. The extent and nature of the construction noise impacts is dependent on activity (for example Site Clearance, Ground Investigation) and proximity to noise sensitive locations. The predicted noise impact from the construction activities was assessed against the thresholds of significance for construction noise. A list of activity-specific measures to mitigate the construction noise impacts if the threshold values are exceeded are outlined in Section 14.6.1 of Chapter 14 of the EIAR by applying these mitigation measures the impacts of construction noise will be managed. There will also be ongoing community liaison channels in place during construction to respond to any specific concerns that arise.

The works specifically relevant to your area, as detailed in Works Layout Plan No. 22 22.02, include:

- Proposed railway electrification, including railway signalling and communications infrastructure, as well as installation of overhead electrification equipment (OHLE);
- Decommissioning and removal of existing overhead 38kV voltage power lines to accommodate the electrification works outlined above; and
- Installation of new underground 38kV voltage power line, which will cross the existing railway at a location approximately 100m west of the existing overhead crossing and be diverted along a section of Weaver Way to facilitate the removal of electrical lines.

4. Night-time works

Due to the importance of the Northern Line to commuters, it is intended that it will remain operational throughout the construction phase. Where possible works will be undertaken in safe zones during daytime periods. In certain circumstances full possession of the railway (i.e. no trains running) will be required and these will typically take place during weekend and night-time possessions.

When night-time works are required, they will be undertaken in accordance with the mitigation measures included in the EIAR, which aim to reduce impacts as much as possible. A Noise Management Plan will be part of the construction stage of the Project. Iarnród Éireann will ensure residents living near the rail line are informed of upcoming works and given advance notice of any disruptive works.

If An Bord Pleanála decides to grant a railway order, the construction programme will be further developed including any changes/improvements in any construction methods/technologies to reduce noise. The need for any additional noise management measures will then be determined and incorporated into the final project design.

As part of the construction strategy, a Community Liaison Officer (CLO) will be appointed for the duration of the Project. The CLO will be in place to communicate with the residents and to address any concerns raised by residents during the construction phase. The CLO will carry out communications activities, such as:

- to provide information to local residents about progress of the Project,
- to share noise and vibration monitoring results and explain noise mitigation measures being put in place,
- to inform the local community about works likely to cause significant noise or vibration and/or works planned to take place outside of core working hours,
- to inform of proposed mitigations regarding the above issues.

5. Operational Vibration

The cumulative operational vibration levels are influenced by the number of intermittent events, such as trains passing. The cumulative operational vibration was calculated and compared with the guideline levels for daytime and night-time periods. The results are presented in Section 14.8 in Chapter 14 of the EIAR. It was determined that no significant vibration is arising from the proposed Project during the operational phase.

6. Privacy

There will be no physical change in the track location, nor in the vantage point from trains as a result of DART+ Coastal North.

While it is acknowledged that the increase in frequency of passing trains may give rise to an increase in the potential for passengers to view the track-side aspect of the submitter's property, it must be noted that this shall take place in the context of an established operational railway in this location.

7. Additional Pollution

Chapter 12 of the EIAR has assessed the likely significant effects of the DART+ Coastal North Project on Air Quality.

With respect to the construction phase, the air quality impact of the redistribution of local road traffic during road closures and from construction traffic has been assessed both locally and regionally. In addition, the assessment considered the impact of construction dust.

With respect to dust nuisance, a sensitivity assessment was completed in Section 12.4 of the EIAR and an assessment of the potential dust generation due to construction has been completed in Section 12.5 of the EIAR. Section 12.6 of Chapter 12 of the EIAR details the mitigation measures for the construction phase of the Project. The contractor will develop and

implement an Air Quality Management Plan and this will be agreed with the respective local authorities prior to construction commencing. The Air Quality Management Plan will include appropriate dust mitigation measures and dust deposition monitoring.

The assessment concluded that when the dust minimisation measures detailed in the mitigation section of this chapter are implemented, fugitive emissions of dust from the site are not predicted to be significant and pose no nuisance, human health or ecological risk to nearby receptors. Thus, there will be no significant residual construction phase dust impacts.

With respect to operational rail impacts, the assessment concluded that there is potential for indirect positive impact to air quality during the operational phase of the Project, largely linked to the operation of DART trains powered by electricity in place of Diesel trains.

Furthermore, Chapter 23 Human Health of the EIAR assesses impacts to health as a result of changes to air quality during construction and operation of the Project, and no significant effects are predicted. For further details, please refer to Section 23.6.1.2 and 23.6.2.2 of Chapter 23 of the EIAR. During operation, the Project is anticipated to result in a minor beneficial (not significant) effect on population health as a result of improved air quality.

As outlined in the response to point #2 above, the removal of a section of the existing overhead ESB lines which currently pass in close proximity to the submitter's property will be removed and diverted as part of the DART+ Coastal North proposals. This will have a positive visual impact on the surrounding area.

3. Summary of Issue Raised

The submission raises concern and confusion over how the submitter will be affected by the adjoining neighbour's CPO. Will it bring construction vehicles and traffic to their cul de sac – raising questions of safety for children.

Response to Issue Raised

1. Adjoining Temporary CPO

The adjoining neighbours CPO relates to the works associated with the removal of the existing overhead lines, as outlined in section 5.8.8.1 of Chapter 5 of the EIAR and in the response to query #2 above. This CPO is temporary in nature and once the required works are completed the lands will be reinstated (if necessary) and returned to the relevant landowner.

Conflicts with the existing electricity infrastructure have been established, relating to two 38kV HV and one MV overhead assets. Two diversions are required, which would see both 38kV HV overhead assets and the MV asset diverted under the tracks using horizontal directional drilling. The temporary land take required to carry out the diversions is summarised in image 5-143 (UTX 1 – Drogheda (Ch. 51,560)) in Chapter 5. The temporary land take includes an allowance for a construction access routes, space for vehicles to pass and turn around on site and space to remove the existing lines.

The existing overhead ESB lines that cross the railway in close proximity to the submitter's property are planned to be diverted via UTX. As shown in image 5-143, a work area, compounds, and access routes have been allocated for the diversion of the existing lines. The northern compound for UTX 1 would be the large compound in the agricultural land to the north planned to support the reconstruction of OBB80/80A/80B accessed off the R150 and the southern compound would be the open scrubland off Wheaton Hall Road. Traffic management would be required along Wheaton Hall Road for the work to link the new HV line back to the existing alignment, for approximately a week.

2. Safety

As noted in the response in section #1 above, should the Proposed Development be approved by An Bord Pleanála and secure all necessary funding, the appointed contractor will be required to develop a Construction Environmental Management Plan (CEMP). The CEMP presents the approach and application of environmental management and mitigation measures for the Construction Phase of the Proposed Development. It aims to ensure that adverse effects from the Construction Phase of the Proposed Development, on the environment and the local communities, are avoided or minimised as far as reasonably practicable. The safety of all persons, including children, will be of paramount importance during construction works.

4. Summary of Issue Raised

The submission raises concerns that disturbance of ditches during construction may cause movement of rodents who inhabit burrows in the ditches into homes along the line. Associated financial and overall health/wellbeing effect of this are raised.

Response to Issue Raised

As noted earlier, a Construction Environmental Management Plan (CEMP) has been prepared as part of the draft Railway Order application. The CEMP will inform the construction on site. The contractor will have responsibility for prevention and management of pests and vermin throughout construction.

Iarnród Éireann will ensure that effective communications channels between the community and the Project team are maintained throughout the Project, so that any concerns can be responded to.

As part of the construction strategy, a Community Liaison Office (CLO) will be appointed for the duration of the Project. The CLO will be in place to communicate with the residents and to address any concerns raised by residents during the construction phase. The CLO will carry out communications activities, such as:

- to provide information to local residents about progress of the Project;
- to explain control measures being put in place;
- to inform the local community about works likely to cause disturbance and/or works planned to take place outside of core working hours;

- to discuss mitigations regarding the above issues.

The CLO will be available at all times during the construction phase if any issues arise.

5. Summary of Issue Raised

The submission notes criticism of Irish Rail and Dart+ lack of communication and acknowledgement of the above issues. The submission claims that where meetings have been arranged, they were inaccessible to young families and the elderly due to their location in hotels etc.

Response to Issue Raised

Córas Iompair Éireann has worked hard to communicate widely and clearly with the general public, as described in the PC No.1 and PC No.2 Public Consultation Reports submitted with the Railway Order application.

In addition to the in-person events held as part of PC2, online webinars were held to ensure members of the public were afforded the opportunity to engage with the Project team during the Public Consultations. Furthermore, the Project team has remained available throughout the design development process to address queries and provide further information where requested.

6.5.3 SB0082 – Railway Terrace Residents. Frank and Richenda Byrne, Joanne Mallon, Simon Gregory, Marie McKeown, Liam Clarke, Elizabeth Hickey.

Representative: n/a

Submission Location – Railway Terrace, Drogheda

1. Summary of Issue Raised

The submission raises concerns in relation to noise disturbance associated with the proposed train cleaning equipment at Drogheda Depot. It is noted that details of the proposed upgrades to the cleaning equipment were omitted from previous consultation materials.

Response to Issue Raised

As noted in section 14.5.2.7 of the EIAR, the installation of a new wheel lathe and a new train wash are not being progressed as part of the Proposed Development and are part of a separate project to DART+ Coastal North. No modifications are required to the existing wheel lathe or the existing train wash. The new wheel lathe and train wash are expected to be operational when the Proposed Development works (at the depot) are completed.

The proposed extension of DART services to Drogheda will likely result in some increase in the frequency that the train wash may be in operation. However, the associated noise levels are expected to remain similar to those experienced today with no significant adverse effects

from the proposed DART+ Coastal North works at the depot predicted, as detailed in Chapter 14 Noise & Vibration.

2. Summary of Issue Raised

The submission requests that a condition be imposed that the equipment/machinery be omitted entirely or moved to a more suitable location much further away from residences.

Response to Issue Raised

The Applicant notes that it is a decision for the Board whether to impose any conditions as part of any Railway Order granted for DART+ Coastal North. However, as detailed above, no such cleaning equipment/machinery are included in the proposed DART+ Coastal North Project.

3. Summary of Issue Raised

The submission notes concern relating to potential noise disturbance resulting from the proposed regrading of the earth bund located adjacent to the service depot and the loss of vegetation associated with the works.

- Based on local experience the submission questions the result of the noise assessment and the decision not to include additional noise mitigation as part of the design solution. Health risks to residents are noted as a possible result of noise impacts and noise is identified as being predominantly resulting from works in the depot building.
- Noise levels of 70-80 decibels have been recorded which exceed WHO guidelines. Issues with existing noise levels are cited as a matter of concern, particularly with the potential for these to worsen as the increase in train activity builds over the coming years as a result of DART+ Coastal North. The submission questions the validity and accuracy of noise surveys at Drogheda MacBride and notes that a request to provide the full signed and validated report of readings taken at Drogheda was made but details were not provided. The submission notes that based on the considerations of the submitter, the “sound levels quoted at Drogheda and 14 other locations are unreliable and unsubstantiated.”
- Concerns are raised that the reductions in height of the bund that were described in the public consultations have been exceeded in the RO application and it is noted that any sound buffering that the bund currently provides will be removed through the proposed regrading of the earth bund.
- The submission claims that the proposals within the RO application do not “*acknowledge or correctly assess the noise disturbance from maintenance equipment and machinery*” which is cited as the main cause of noise disruption in the area as opposed to train engine noise. Concerns are raised in relation to potential for an increase in the hours of operation once the new fleet has been brought into service and the level of activities increase over time and the hours of disturbance being prolonged into the night time hours.

- The submission refers to consultation and discussion around mitigation measures but concludes that the replanting of the earth bund at Drogheda, as the only form of mitigation, is not nearly enough to address the existing or future noise issues linked to Drogheda MacBride Station.

Response to Issue Raised

Based on the detailed noise assessments completed as part of the EIAR, in line with standard industry practices and guidelines, no additional mitigation measures beyond the replanting of the earth bund at Drogheda MacBride Station are deemed to be required.

1. Noise Surveys and Levels

The Applicant does not agree that the *“sound levels quoted at Drogheda and 14 other locations are unreliable and unsubstantiated.”* A detailed explanation of the survey information used in the EIAR assessments has previously been shared with the residents of Railway Terrace as part of the statutory consultation period to clarify the basis of the surveys undertaken.

Firstly, as detailed in the EIAR, environmental noise surveys were completed at seventeen locations in total and it is these surveys which form the basis for the noise impact assessment. Fifteen of these surveys were unattended (i.e. a noise monitor was set up and left to monitor continuously for a fixed period) while two of the surveys were attended surveys (with personnel taking measurements over a fixed period of time, shorter than the unattended surveys). The volume of data associated with the unattended surveys was significant, given that this was over a much longer period, and the noise survey company (NVM) Reports in the EIAR appendices were therefore summary reports as would be standard practice. NVM reported on the two attended locations separately and (given the less significant level of data) included this data within these summary reports. Further information of the environmental noise survey is presented in Appendix 14.1 Baseline noise and vibration monitoring for DART+ Coastal North in Volume 4 of the EIAR. All the raw data gathered in the environmental baseline survey was considered in the assessment with the results being presented in section 14.4 Receiving Environment and within Table 14-11 Noise survey results in the EIAR. This table provides a summary of results at all 17 locations where noise surveys were undertaken, including location reference “NML 02” Railway Terrace, Wheaton Hall, Drogheda, Co. Louth.

To simplify the presentation of the environmental noise survey data, the results of baseline noise measurements have been consolidated into relevant averages of background noise levels (LA90,T) and ambient noise levels (LAeq,T). This allows for a clearer and more focused presentation of the key findings.

For levels of noise that vary widely with time, for example rail traffic noise, it is necessary to employ an index which allows for this variation. The L90,T, the level exceeded for 90% of the time, has been adopted to represent the background noise level. It is noted that the dB(A) is the unit used to define a weighted sound pressure level, which correlates well with the subjective response to sound. The ‘A’ weighting follows the frequency response of the human

ear, which is less sensitive to low and very high frequencies than it is to those in the range of 500Hz to 4kHz.

The noise levels presented in Table 14-11 of Chapter 14 Noise and Vibration present two metrics: the LAeq,T and the LA90,T. While we do not have sight of the methodology or basis of the recorded values in the vicinity of Railway Terrace (as stated in the submission) of around “70 and 80dB”, it is possible, that the values may be either un-weighted (i.e. before the A-weighting (described above) has been applied), or the values could possibly relate to a record of maximum noise level identified during a particular measurement period (LAFmax).

The environmental noise survey completed as part of DART+ Coastal North provides a basis to determine the change in noise level expected as a result of the implementation of the Proposed Development. Table 14-42 of section 14.4 Potential Impacts, identifies that the residential receptors within the study area, which includes receptors at Railway Terrace, are predicted to experience negligible or minor adverse impacts as a result of the implementation of the DART+ Coastal North Project. The impacts result from the change in operational railway noise levels attributed to the Proposed Development when compared to the existing conditions. Furthermore, Section 14.5.2.7 “Assessment of operational depot noise” concludes that “noise from the operation of the depot is not considered likely to result in a significant adverse effect on residential receptors”. On the basis of the Proposed Development, and in line with the assessment methodology, no additional mitigation was therefore required as part of the DART+ Coastal North Project.

2. Height of Bund

The proposed works will require excavations and regrading of the earth bund at Drogheda MacBride Station, reducing the height of the bund by up to 1.5m, to accommodate the additional space required for two new stabling roads (7A & 7B) with associated provision for train drivers’ walkways, lighting, water, and power supply points. The works will involve vegetation clearance over the entire bund and earthworks to reprofile the existing bund (~10,000 m³ un-bulked volume to be removed). The reprofiled bund will be replanted following completion of the works.

Proposed impacts on the existing earth bund were included in the public consultation documentation and were discussed with residents of Railway Terrace during consultation meetings where the residents’ concerns were clearly stated. The scale of the impact on the earth bund has remained relatively constant throughout the design development, however the extent of impact on the overall height varies across the length of the bund.

The noise assessment carried out as part of Chapter 14 of the EIAR assessed the proposed works to the existing bund and in section 14.5.2.7 it notes that “*This bund is situated in front of the main maintenance shed with visual screening provided by tree planting. The tree planting and the height of the existing bund are not likely to be providing any measurable noise reduction to the maintenance shed, therefore, it is considered likely that noise from the Proposed Development would result in negligible noise impact from the maintenance shed. As a result, noise from the operation of the depot is not considered likely to result in a*

significant adverse effect on residential receptors.” Based on the assessments, no further mitigation is considered to be necessary as a result of the proposed works.

The Applicant acknowledges the concerns raised by the submission in relation to noise disturbance from maintenance equipment and machinery, however the assessments completed do not suggest that additional mitigation measures are required based on the noise change that does not result in likely significant noise effects.

It is important to note that the bulk of additional maintenance works that will result from the DART+ Programme will be scheduled to take place in the new maintenance depot which forms part of the separate DART+ West development. Maintenance works at the Drogheda Depot are expected to remain somewhat similar to those experienced today, although this may potentially be revised in the future depending on future maintenance and operational requirements.

3. Operational Hours

With regards to concerns raised in relation to future operational hours, it should be noted that the railway is a 24/7 operation, and it is Iarnród Éireann's statutory obligation to operate and maintain it to the required standards of safety and level of service. The fleet and track must be maintained during the limited hours available when passenger services are not running. Iarnród Éireann endeavours to mitigate noise as much as practical. When maintenance programmes are due in the vicinity of residents the work is planned in such a way as to stagger activity and to adopt construction methodologies that mitigate noise disturbance.

4. Mitigation Measures Proposed

The Applicant acknowledges the concerns raised in relation to limitations on proposed mitigation. However, as detailed in the EIAR, and as stated previously, Section 14.5.2.7 of the EIAR on “Assessment of operational depot noise” concludes that “*noise from the operation of the depot is not considered likely to result in a significant adverse effect on residential receptors*”. Therefore, no additional mitigation was considered beyond the replanting of the earth bund at Drogheda MacBride Station.

4. Summary of Issue Raised

The submission requests that conditions be imposed on DART+ Coastal North to mitigate against noise & light disturbance resulting from the Drogheda Maintenance Depot. The suggested conditions are as follows:

- Sound proofing the depot building itself,
- Trees and hedgerows should be planted on the bank adjacent to residents' garden in addition to the proposed replanting of the bund,
- Replanting on the bund should be very mature in height/growth as saplings could take upwards of 30 to 40 years to provide the same sound buffering as the current planting,
- Expenses to be offered to residents in adjacent homes to implement domestic soundproofing measures.

Response to Issue Raised

The Applicant notes that it is a decision for the Board whether to impose any conditions as part of a planning decision on DART+ Coastal North.

The Applicant notes that a comprehensive noise survey and assessment of the potential effects of the Proposed Development has been undertaken and is presented in the EIAR (Chapter 14 Noise & Vibration) which accompanied the Railway Order application. This assessment was carried out in accordance with the relevant EU and national legislation and best practice guidance.

Table 14-42 of section 14.4 Potential Impacts, identifies that the residential receptors within the study area, which includes receptors at Railway Terrace, are predicted to experience negligible or minor adverse impacts during the operational phase as a result of the implementation of the DART+ Coastal North Project. The impacts result from the change in operational railway noise levels attributed to the Proposed Development when compared to the existing conditions. Furthermore, Section 14.5.2.7 “Assessment of operational depot noise” concludes that *“noise from the operation of the depot is not considered likely to result in a significant adverse effect on residential receptors”*.

On this basis, and in line with the assessment methodology, no additional mitigation was therefore proposed as part of the Proposed Development.

It is further noted that, in respect of the potential mitigation through the planting of trees and hedgerow, that the gaps between individual tree foliage presents a limitation on their performance as noise barriers. The effect of a row of trees is almost negligible due to the diffraction of sound from the foliage and the transmission of sound through the gaps.

5. Summary of Issue Raised

The submission refers to a variety of impacts associated with the proposed extension of Platform 4 and concourse as part of the Project proposals. Concerns are noted in relation to the proximity of the proposed platform extension to the Railway Terrace properties.

- The submission refutes the findings of the EIAR Noise Assessments that there will be “no residual significant railway noise effects predicted.” The submission also refers to discussions between the Project team and residents about expected noise disturbance and mitigation measures suggested,
- The submission notes the proximity of the future platform 4 to the Railway Terrace properties and expectations of “new and significant disturbance in terms of railway operations both day and night from the following sources directly adjacent to homes”. Noise sources are noted as resulting from the following:
 - Noise from new Platform PA / Tannoy systems
 - Noise from Train Horns on the proposed platform 4
 - Platform noise from rail users
 - Noise from on board train systems (alarms, PA etc)

- Concerns are raised in relation to a lack of formal lighting design included with the RO Application. Concerns relating to glare and ambient light in the area are noted as particular concern if appropriate lighting is not provided.
- Concerns are raised that the installation of additional pylons and OHLE on the tracks will have a negative impact on the existing view from rear windows of properties and from back gardens.

Response to Issue Raised

The submission refers to a variety of impacts associated with the proposed extension of Platform 4 and concourse as part of the Project proposals. Concerns are noted in relation to the proximity of the proposed platform extension to the Railway Terrace properties.

- The submission refutes the findings of the EIAR Noise Assessments that there will be “no residual significant railway noise effects predicted”. The submission also refers to discussions between the Project team and residents about expected noise disturbance and mitigation measures suggested.
- The submission notes the proximity of the future platform 4 to the Railway Terrace properties and expectations of “new and significant disturbance in terms of railway operations both day and night from the following sources directly adjacent to homes”. Noise sources are noted as resulting from the following:
 - Noise from new Platform PA / Tannoy systems
 - Noise from Train Horns on the proposed platform 4
 - Platform noise from rail users
 - Noise from on board train systems (alarms, PA etc)
- Concerns are raised in relation to a lack of formal lighting design included with the RO Application. Concerns relating to glare and ambient light in the area are noted as particular concern if appropriate lighting is not provided.
- Concerns are raised that the installation of additional pylons and OHLE on the tracks will have a negative impact on the existing view from rear windows of properties and from back gardens.

6. Summary of Issue Raised

The submission requests that conditions be imposed on DART+ Coastal North to mitigate against noise & light disturbance resulting from the proposals relating to Platform 4. The suggested conditions are as follows:

- Operational time restrictions be placed on the use of PA / tannoy systems on Platform 4 between the hours of 11pm and 7am.
- Operational time restrictions be placed on the use of train horns between the hours of 11pm and 7am.
- Appropriate digital signage be used on Platform 4 in lieu of the use of PA / tannoy systems where possible.
- Planting of mature trees on the bank adjacent to homes.

- All lighting poles to have glare shields fitted to restrict light and ensure only desired space for rail users area illuminated.
- Operational time restrictions be placed on the use of lighting on Platform 4 to ensure lights are turned off once the space is not in use.

Response to Issue Raised

The Applicant notes that it is a decision for the Board whether to impose any conditions as part of a planning decision on DART+ Coastal North.

However, the Applicant notes the following:

1. Operational Hours

With respect to operational hours, it should be noted that the railway is a 24/7 operation, and it is Iarnród Éireann's statutory obligation to operate and maintain it to the required standards of safety and level of service. The fleet and track must be maintained during the limited hours available when passenger services are not running. Iarnród Éireann endeavours to mitigate noise as much as practical. When maintenance programmes are due in the vicinity of residents the work is planned in such a way as to stagger activity, and to adopt construction methodologies that mitigate noise disturbance.

2. PA systems

The noise assessments carried out as part of Chapter 14 of the EIAR have stated in section 14.5.2.8.1 Public voice alarm systems (PA), PA overspill is expected to be audible at the nearest residences during quieter time periods, and depending on the frequency of announcements has the potential to result a significant adverse effect. Section 14.6.2.4 of Chapter 14 outlines recommended mitigation measures to be implemented to control noise effects from the PA system to eliminate the risk of significant effects from occurring. Iarnród Éireann (IÉ) has a standard procedure for the design of station services which includes a procedure for the design of PA systems. Considering these mitigation measures, PA system overspill is not expected to result in significant adverse effects.

3. Planting of Mature Trees

The Applicant notes that where possible and necessary to do so, provision has been made to avoid and/or limit the impacts of the Project on surrounding residents and stakeholders. As noted above, provision has been made for the retention, and replanting where necessary, of the vegetated area located to the west of the Railway Terrace properties to provide landscape mitigation against noise and visual impacts. For safety reasons it is not always possible to plant additional trees which could potentially present a risk when located in close proximity to existing or proposed overhead electrical wires and as a result the extents of planting in the area surrounding Railway Terrace is limited to what is proposed in Sheet number 9 of Figure 15.3 in the EIAR. As noted previously, any potential impact on privacy, as on either noise or visual impacts, needs to be considered in the context of a live railway station

4. Lighting

All lighting forming part of DART+ Coastal North shall be installed in line with best practice, being cognisant of angling lights away from residential properties where possible to do so. Existing lighting at the station and the depot is required to provide security and safety to rail users and staff. Lighting has and will continue to be upgraded to modern standards, and when doing so the minimisation of unnecessary overspill of such lighting into neighbouring properties is undertaken. Section 15.6.3 notes that any new lighting shall seek to use modern fittings with directional horizontal cut-off cowling as part of mitigation measures utilised

7. Summary of Issue Raised

The submission notes a concern with loss of privacy due to proposed location of platform 4:

- The submission notes a serious loss of privacy for residents in homes adjacent to the rail with windows and gardens in full view of rail users on Platform 4. The submission refers to informal agreement during public consultation for planting of trees to mitigated against loss of privacy and against glare from lighting.
- The submission raises concerns that the DART+ Coastal North Project may lend itself to future development on existing freight tracks which could result in additional activities taking place in closer proximity to the Railway Terrace properties further raising concerns with loss of privacy, further noise and light disturbance and risk to security from increased access.

Response to Issue Raised

The Applicant notes that where possible and necessary to do so, provision has been made to avoid and/or limit the impacts of the Project on surrounding residents and stakeholders. As noted above, provision has been made for the retention, and replanting where necessary, of the vegetated area located to the west of the Railway Terrace properties to provide landscape mitigation against noise and visual impacts. For safety reasons it is not always possible to plant additional trees which could potentially present a risk when located in close proximity to existing or proposed overhead electrical wires and as a result the extents of planting in the area surrounding Railway Terrace is limited to what is proposed in Sheet number 9 of Figure 15.3 in the EIAR. As noted previously, any potential impact on privacy, as with either noise or visual impacts, needs to be considered in the context of a live railway station.

The Applicant can only comment on aspects of DART+ Coastal North as part of responses to the Railway Order Submissions for DART+ Coastal North.

Should any future projects be progressed which have the potential to impact on neighbouring properties then appropriate consultation shall be carried out between Iarnród Éireann and those affected.

8. Summary of Issue Raised

The submission requests that conditions be imposed on DART+ Coastal North to mitigate against potential impacts on privacy associated with Platform 4 proposals. The suggested conditions are as follows:

- Planting of mature trees on the bank adjacent
- Further development of the bank of land directly adjacent to the properties for either public or service use to be prohibited.

Response to Issue Raised

The Applicant notes that it is a decision for the Board whether to impose any conditions as part of a planning decision on DART+ Coastal North.

The Applicant notes that the assessments completed do not suggest a need for additional mitigation measures beyond what is already included in the design. Mitigation in the form of replanting the wooded area adjacent to the Railway Terrace properties is already proposed.

The Applicant can only comment on aspects of DART+ Coastal North as part of responses to the Railway Order Submissions for DART+ Coastal North.

Should any future projects be progressed which have the potential to impact on neighbouring properties then appropriate consultation shall be carried out between Iarnród Éireann and those affected as appropriate.

9. Summary of Issue Raised

The submission raises concern relating to the removal of existing landscape features and hedgerows located adjacent to the Railway Terrace properties and the R132. The submission requests that if trees are removed and replanted, the condition to be imposed that ensure the replanting be specific to the protected species being removed and trees are very mature in height.

Response to Issue Raised

Mitigation measures are proposed to avoid, reduce or remediate, wherever possible significant negative landscape and visual effects of the Construction and Operation Phase of the Proposed Development. Section 15.6.3 and Section 15.6.3 of the EIAR outline the mitigation measures proposed as part of the Construction and Operational phases of the Proposed Development. The mitigation measures include replanting of woodland area adjacent to Dublin Road rail bridge / Railway Terrace, Drogheda, as far as reasonably practicable.

In accordance with best methodologies and practice, that following general measures are proposed for the mitigation of landscape / townscape and visual impacts:

Where existing trees, hedges, and / or plantings are removed, new planting will be provided in replacement of those removed. In general, unless not feasible or practicable, new plant

species will match those removed. Replacement plant sizes will be those that are readily available and therefore, are unlikely to match the maturity of plants removed (especially in the case of trees or larger plants). However, being of the same or similar species, maturity similar to that of the existing can be achieved in time.

The Proposed Development will provide for the planting of new trees and shrubs both for mitigation of tree removal and for screening of proposals particularly substations. Species shall be selected to be appropriate to the characteristics of the specific location and to limit potential impacts on the operation of the railway due to mature height or leaf fall.

10. Summary of Issue Raised

The submission raises a variety of concerns in relation to construction noise and the effects of construction noise on residents' health and mental wellbeing.

Response to Issue Raised

1. Construction Noise

A detailed description of the proposed construction works, and phasing is outlined in Chapter 5 Construction Strategy of the EIAR.

It is acknowledged that short-term increases in noise impacts in certain areas will occur during the construction phase of the proposed Project due to the requirement to use heavy plant and machinery. Section 14.6.1 of Chapter 14 Noise & Vibration of the EIAR identifies general mitigation measures that will be implemented during construction works. The extent and nature of the construction noise impacts is dependent on activity (for example Site Clearance, Ground Investigation) and proximity to noise sensitive locations. The predicted noise impact from the construction activities was assessed against the thresholds of significance for construction noise. A list of activity-specific measures to mitigate the construction noise impacts if the threshold values are exceeded are outlined in Section 14.6.1 of Chapter 14 of the EIAR. By applying these mitigation measures the impacts of construction noise will be managed. There will also be ongoing community liaison channels in place during construction to respond to any specific concerns that arise.

A wide variety of construction noise impacts are relevant to the Railway Terrace locality as summarised in section 14.5.1.1.6 which include:

- Reconstruction of OBB80/80A/80B Railway Terrace Bridge (triple span);
- Widening of UBK01 Dublin Road Bridge;
- Span replacement of OBB81 Drogheda Station footbridge;
- Construction of Platform 4 (on Drogheda Freight Line) and associated trackwork;
- Construction of Drogheda Substation;
- Works on Light Maintenance Roads and Under Frame Cleaning (UFC) facility within the station;
- Works on Stabling Roads 7a and 7b within the station;
- Works on Northern Head-shunt within the station; and

- OHLE and SET line wide works.

These works will result in a moderate or major impact at approximately 90 residential properties at Saint's Mary's Villa, Mount Auburn Close, Railway Terrace, Bryanstown Manor, and Dublin Road.

2. Night-time works

Due to the importance of the Northern Line to commuters, it is intended that it will remain operational throughout the construction phase. Where possible works will be undertaken in safe zones during daytime periods. In certain circumstances full possession of the railway (i.e. no trains running) will be required and these will typically take place during weekend and night-time possessions.

When night-time works are required, they will be undertaken in accordance with the mitigation measures included in the EIAR, which aim to reduce impacts as much as possible. A Noise Management Plan will be part of the construction stage of the Project. Iarnród Éireann will ensure residents living near the rail line are informed of upcoming works and given advance notice of any disruptive works.

If An Bord Pleanála decides to grant a railway order, the construction programme will be further developed including any changes/improvements in any construction methods/technologies to reduce noise. The need for any additional noise management measures will then be determined and incorporated into the final project design.

The Applicant is sorry to hear of the issues raised in the submission from the residents of Railway Terrace in relation to experiences in the past. With regards to the proposed DART+ Coastal North Project construction phase, prior to the commencement of construction works, a dedicated Community Liaison Officer will be appointed to communicate details of all upcoming works and to oversee the implementation of all required mitigation measures, thereby minimising any potential disruption resulting from the works.

During the construction phase, residents living in close proximity to any planned works will receive ongoing communication in advance of significant works - i.e. piling or ground penetrating surveys. During the construction period, the dedicated community liaison officer's phone will be available 24/7 to address any issues that may arise. The CLO will be in place to communicate with the residents and to address any concerns raised by residents during the construction phase. The CLO will carry out communications activities, such as:

- to provide information to local residents about progress of the Project,
- to share noise and vibration monitoring results and explain noise mitigation measures being put in place,
- to inform the local community about works likely to cause significant noise or vibration and/or works planned to take place outside of core working hours,
- inform of mitigations regarding the above issues.

11. Summary of Issue Raised

The submission requests that conditions be imposed on DART+ Coastal North to mitigate against construction noise & disturbance resulting from the proposals at Drogheda MacBride Station. The suggested conditions are as follows:

- Operating hours of works adjacent to homes be limited to avoid heavy works taking place between 11pm and 7am.
- Acoustic screening be used for all heavy works adjacent to residences.
- Acoustic enclosures to be used for all lighter works, handheld equipment such as saws, drills etc.
- A no idling policy be implemented during works where engines of all machinery are turned off when not in current use.

Response to Issue Raised

The Applicant notes that it is a decision for the Board whether to impose any conditions as part of a planning decision on DART+ Coastal North.

1. Operational Hours

The Applicant would have very serious concerns around a condition of this type, given the nature of the works and the need to minimise disruption to the operational railway. While general construction works away from the railway line (e.g. substation construction) will be undertaken during normal construction hours (see Chapter 5 Construction Strategy of the EIAR, Section 5.2.2), it is noted that the construction of the DART+ Coastal North Project requires track possessions (i.e. temporary track closures) to enable construction works to be completed.

As detailed in Section 5.2.2 of the EIAR, *“In general, night-time possessions will be utilised, but it is anticipated that a number of daytime and weekend possessions will also be required, to accommodate the construction works. These possessions will be planned with other railway works and peak railway user demand periods in mind.”* The track possession types and durations are set out in Table 5-3 of the EIAR.

Given that some works will often need to be undertaken when the railway is closed to train services, a number of the construction compounds will often need to be active at night and at weekends, to allow Contractors to marshal construction plant and materials, involving both road and rail vehicles. As detailed in Section 5.2.2 of the EIAR: *“Any proposed track possession periods will be finalised when detailed design and detailed construction planning is undertaken. For the purposes of the EIAR a reasonable worse case has been assumed here and for the assessments undertaken in Chapters 6 to 27 in Volume 2 of this EIAR.”*

It is noted that neither DART+ West nor DART+ Southwest contained such a condition. or the reasons noted above, the Applicant respectfully requests that this condition not be attached to any grant of permission.

2. Acoustic Screening

Chapter 14 Noise & Vibration sets out a suite of mitigation measures to minimise the noise and vibration impact of the construction phase on sensitive receptors, including local residents. This includes the use of screens where necessary and practicable (see Section 14.6.1.7 for example in the EIAR). It is noted that for some worksites it will not be practicable to install localised screens due to the constrained nature of the work area. However, where practicable, screens will be installed by the Contractor. The Applicant is committed to the implementation of these and the other measures included in Chapter 14 and the Construction Environmental Management Plan (Appendix A5-1 of the EIAR).

The Applicant also notes Section 14.6.1.11 which sets out the Applicants approach to the provision of temporary accommodation, should the proposed mitigation measures not be sufficient to fully mitigate the noise impact, during the construction phase.

3. Acoustic Enclosures

The Applicant notes Section 14.6.1.5 which states that “*careful consideration will be given to the noise emission levels of plant items when they are being considered for use on the site. This practice is proposed in relation to sites with static plant such as compressors and generators. It is proposed that these units be supplied with manufacturers’ proprietary acoustic enclosures where possible. The potential for any item of plant to generate noise will be assessed prior to the item being brought onto the site. The least noisy item should be selected wherever possible. Should a particular item of plant already on the site be found to generate high noise levels, the first action should be to identify whether or not said item can be replaced with a quieter alternative.*”

The Applicant is committed to the implementation of all mitigation measures included in the EIAR.

4. No Idling Policy

This measure is already included in the EIAR, see Section 14.6.1 which includes the following measure to be implemented where feasible during the construction phase:

- “3. h. Do not leave equipment or vehicles running/idling unnecessarily.”

The Applicant is committed to the implementation of all mitigation measures included in the EIAR.

6.5.4 SB0090 – Kevin Enright

Representative: n/a

Submission Location – Monasterboice (General Submission)

1. Summary of Issue Raised

The submission welcomes the DART+ Coastal North Project but notes two significant negative consequences arising from the Project:

- Slower Intercity Trains: Increased suburban DART services will slow down Intercity trains from Belfast/Dundalk/Drogheda. The submission notes that journey times for the Enterprise Service from Belfast are expected to increase as a result of the increased frequency of DART services and notes that journey times for the Enterprise have not been quantified in the DART+ Coastal North Assessments.
- The Howth Branch will be downgraded to a shuttle service, requiring passengers to change trains at Howth Junction. The submission raises concerns that receiving trains at Howth Junction & Donaghmede Station, arriving from the North, may only have standing room available during peak times. The submission also raises concerns relating to increased journey times for Howth commuters.

Response to Issue Raised

The Applicant acknowledges and appreciates the support for the DART+ Coastal North Project offered in the submission.

Please refer to Section 2.2.19 - Impact on Intercity/Enterprise Trains.

Please refer to the sections identified below in relation to impacts on the Howth Branch involving the operation of a shuttle service and an interchange at Howth Junction and Donaghmede Station.

- Section 2.3.1.1 - Concern over removal of direct service / Lack of Direct Service,
- Section 2.3.1.2 - Need for Interchange - Journey times / Journey Amenity/Journey Characteristics and
- Section 2.3.1.13 - Passenger capacity of receiving trains arriving from the North at Howth Junction & Donaghmede station.

Summary of Issue Raised

The submission notes that September 2024 timetable changes, introduced to facilitate hourly Enterprise services, led to a significant drop-off in punctuality. These changes were partially reversed in October 2024, but delays to the Enterprise journey times remain a significant problem.

The submission raises concern that proposed increases in Enterprise services, on an hourly basis, may lead to further disruption to journey times. The submission notes a lack of resilience in the existing railway infrastructure on the Northern Line.

Response to Issue Raised

Refer to Section 2.2.20 where issues with previous timetable changes are addressed.

Summary of Issue Raised

The submission calls for the provision of four-tracking on the Malahide/Connolly line to be included in current public transport strategies and land use planning to support Ireland's climate change objectives.

Response to Issue Raised

Refer to Section 2.2.21 where long term planning in public transport and land use are addressed.

Summary of Issue Raised

The submission puts forward a number of proposed solutions to issues with congestion and resilience of the Northern Line:

- Increase Tracks: Increase the number of tracks from 2 to 4 between Connolly and Malahide, with provisions for 4 tracks to Drogheda included in public transport policies and land use planning.
- New Passing Loops: Install new passing loops at Skerries, Mosney/Gormanstown, Malahide, and between Dublin and Howth Junction.

Response to Issue Raised

Refer to Section 2.2.22 where issues with existing congestion and resilience of the Northern Line are addressed.

6.5.5 SB0142 – Robert Kenny

Representative: n/a

Submission Location – Drogheda

1. Summary of Issue Raised

The submission notes its support for the extension of DART services to Drogheda but cites a lack of ambition by CIE in not extending the Project beyond its current extents. The submission notes that a new station located to the north of the River Boyne would be beneficial to the Drogheda North area, citing existing issues with congestion within the wider Drogheda area, access to Drogheda MacBride Station, and limited parking facilities at Drogheda MacBride

Station as factors that may limit the effectiveness of the current proposals. The submission refers to a location north of the River Boyne that would be suitable for the development of a new station that could support the growing population of North Drogheda who currently do not have easy access to Drogheda MacBride Station on the South of the River Boyne.

The single-track crossing carried by the Boyne Viaduct is cited as a limiting factor in the decision to terminate DART+ Coastal North at Drogheda MacBride Station.

Response to Issue Raised

The Applicant acknowledges and appreciates the support for the DART+ Coastal North Project in the submission.

1. Future extension of DART+ Coastal North beyond Drogheda MacBride Station

The strategy for the provision of any additional new stations and other rail infrastructure interventions beyond the current extents of DART+ Coastal North is a matter for the National Transport Authority (NTA).

The design of the Project will be compatible with any future extensions and/or additional links/branches that may be added to the Northern Line as part of any future Iarnród Éireann projects. The current proposals will not preclude any future developments such as an extension of DART+ Coastal North beyond its current extents.

2. Parking limitations at Drogheda MacBride

Additional parking facilities at stations are not included as part of DART+ Coastal North's project scope, which is focussed on the development of infrastructure to facilitate the increase in train frequency on both the Northern and Howth Branch lines. However, separately to the DART+ Coastal North Project and outside the railway order, Iarnród Éireann are progressing a number of projects including the Multimodal Interchange Project, DART Station Enhancement Project and, Carparks Programme aimed at developing stations to support future needs.

The Multimodal Interchange Project will assess all stations throughout the network with a view of implementing its strategy at stations where there is need for modifications that will have an impact on multimodal travel and station access. The Project will assess a variety of multimodal options at stations including but not limited to the provision of secure bicycle parking and shared mobility services.

Additionally, the DART Station Enhancements Project will review the future requirements at DART stations and make proposals for future projects.

APPENDIX A

Additional Information in respect of Meath County Council Submission – Point 13 (Archaeological Assessment)

Archaeological Test Excavation Services are required at 12 locations.

While there are no recorded monuments within these areas, and field inspection or an analysis of historic maps and aerial photography did not reveal any newly identified sites, these areas were put forward for assessment as they were considered to be of an archaeological potential given their greenfield nature, previously undisturbed soils and/ or proximity to designated monuments.

Testing will also take place to verify the results of the geophysical survey. The purpose of testing is to determine the location, date, nature and extent of any previously unknown archaeological site. The test trench layouts target the green field potential of the lands.

Table A-1 Location of Archaeological Test Excavations

Area Ref.	Zone	Townland	County	Ref in RO
1	Zone B	Maynetown	Dublin	AAP4
2	Zone C	Corballis	Dublin	AAP7
3	Zone C	Tyrrelstown	Dublin	AAP13
4	Zone C	Hacketstown	Dublin	AAP15
5	Zone C	Barnageeragh	Dublin	AAP18
6	Zone C	Hampton Demesne	Dublin	AAP20
7	Zone C	Bremore	Dublin	AAP22
8	Zone D	Gormanston 1	Meath	AAP26
9	Zone D	Irishtown	Meath	AAP27
10	Zone D	Colp East (S)	Meath	AAP34
11 & 12	Zone E	Newtown/ Lagavooren	Meath/ Louth	AAP37

Within County Meath 4 areas will be assessed by test trenching, these are as detailed in Table A-2 below

Table A-2 Locations and Details of Test Excavations in County Meath

Area ref.	Chainage	Townland	SMR ref.	Site type	Geophys ref.	Description	Aims of testing	Required linear metres
8/ AAP 26	40+070- 40+220	Gormanston 1	N/A	N/A	23R0483	A circular response (diam.6m) is located in the north-west of the data. This is indicative of a circular ditched feature and is considered to be of clear archaeological potential. This is now located outside the area proposed for the line wide works compound. Surrounding the probable circular ditch are a series of curvilinear responses which are indicative of ditched features. These may represent a former field system, possibly associated with the circular ditched feature. Elsewhere, isolated responses have no clear pattern. However, they may represent isolated pit-type features and are considered to be of archaeological potential.	Targeted testing to take place to assess archaeological significance of geophysical anomalies and determine the below ground potential through test excavation. Confirm if archaeological features are present and if so, identify site type, nature, extent and significance, to inform assessment of site importance and impact significance.	105m

Table A-2 Locations and Details of Test Excavations in County Meath

Area ref.	Chainage	Townland	SMR ref.	Site type	Geophys ref.	Description	Aims of testing	Required linear metres
9/ AAP 27	41+280- 41+420	Irishtown	N/A	N/A	23R0485 – not suitable for survey, magneticall y disturbed	Gormanston substation and Construction Compound. The lands form part of the Irish Army training camp. Previously, access was not granted.	Determine the below ground potential through test excavation. Confirm if archaeological features are present and if so identify site type, nature, extent and significance, to inform assessment of site importance and impact significance.	150m

Table A-2 Locations and Details of Test Excavations in County Meath

Area ref.	Chainage	Townland	SMR ref.	Site type	Geophys ref.	Description	Aims of testing	Required linear metres
10/ AAP 34	49+200	Colp East (S)	ME02 1-037	Ringf ort	23R0488	The data is dominated by broad amorphous responses, indicative of natural variations in the underlying geology. A curvilinear trend and some isolated responses were recorded in the north of the data. It is possible that these represent further natural variations. However, it is equally possible that plough damaged archaeology is represented here. Interpretation is tentative as there is no clear archaeological pattern. Overhead divisions (OHDV1). Works at this location have been minimized and moved to a location outside the zone of notification for the ringfort (ME021-037)	Targeted testing to take place to assess the archaeological significance of the geophysical anomalies and determine the below ground potential of the areas of impact through test excavation. Confirm if archaeological features are present and if so identify site type, nature, extent and significance, to inform assessment of site importance and impact significance.	80m
11 & 12/ AAP 37	51+700 and 52+100	Newtown/ Lagavooren	N/A	N/A	23R0489 – not suitable for geophysical survey	Diversion compound is proposed in scrub ground to the south of the existing railway track. Compounds (substation and construction) proposed in arable fields to the north to the track.	Determine the below ground potential through test excavation. Confirm if archaeological features are present and if so identify site type, nature, extent and significance, to inform assessment of site importance and impact significance.	65m and 455m

The majority of the proposed permanent works and interventions are expected to be carried out within the existing railway corridor boundary, for example:

- Provision of turnback facilities at Malahide, Clongriffin and Howth Junction and Donaghmede Stations;
- Modifications to existing tracks and platforms;
- Overhead Line Equipment (OHLE) (such as wires and masts) from north of Malahide to Drogheda will require support structures that will be spaced between 40m-50m on average;

Some ground disturbance will be required outside of the existing railway boundary and there is a possibility that these works may impact on previously unknown below ground archaeology, these works include:

- Construction of substations;
- Ground works required for construction/ storage compounds and access roads;
- Bridge modifications/ improvements to facilitate extended electrification;
- Secant and cantilevered walls;
- The temporary/permanent diversion, realignment and widening of roads, junctions and pavements, and/or the provision of temporary access routes;
- Utility diversions;
- Drainage and attenuation; and
- Landscaping works.

It has been acknowledged that access for decommissioning existing utilities will not require earthmoving or excavation works. Similarly, no excavation works will be required for access work for UTX, track matting or geotextile solutions will be sought. For UTX compounds there will be no excavation or topsoil stripping of the ground surface. A geotextile solution with hardcore will be sought if required within the compound location.

Table A-3 List of Heritage Assets, Description, Impact and Proposed Mitigation

AAP Ref.	Townland	Potential	Chainage	Construction Ref:	Sensitivity Rating	Impact	Significance	Mitigation
AAP25a	Gormanston	Greenfield potential, however the work is very localised.	39+700-39+840	Underground utility diversion (UTX11)	Low	Medium	Direct, Negative, Slight, Permanent	Archaeological Monitoring
AAP25b	Gormanston	Proximity of ME028-021 where geophysical anomalies were detected but these will remain unaffected by the proposed works. Work is very localized.		Overhead diversions	Medium	Low	Direct, Negative, Slight, Permanent	Works to take place under archaeological supervision
AAP26	Gormanston	Proposed compound located in a level grass field. Greenfield potential. Geophysical anomalies of probable archaeological derivation were detected.	40+070-40+220	Linewide works compound - All earthmoving works in this area	Medium	Medium	Direct, Negative, Moderate, Permanent	Archaeological Test Excavation to verify the nature and extent of the subsurface features.
AAP27	Irishstown	Open green field with the potential to reveal below ground archaeological features. 23R0485 – not suitable for survey, magnetically disturbed.	41+280-41+420	Gormanston substation and Construction Compound The lands form part of the Irish Army training camp. Access was not granted.	Low	Medium	Direct, Negative, Slight, Permanent	Determine the below ground potential through test excavation. Confirm if archaeological features are present and if so identify site type, nature, extent and significance, to inform assessment of site importance and impact significance.

AAP Ref.	Townland	Potential	Chainage	Construction Ref:	Sensitivity Rating	Impact	Significance	Mitigation
AAP28	Corballis	Greenfield and brownfield potential. Area has experienced previous disturbance.	44+260-44+600	Proposed works compounds for the viaduct and UTX Diversion compound	Low	Medium	Direct, Negative, Slight, Permanent	Archaeological Monitoring
AAP29	River Nanny/ Ninch	Disturbed brownfield and located on the northern bank of the River Nanny. Area has experienced previous disturbance.	44+620-44+720	Proposed viaduct works compound	Low/ Negligible	Medium	Direct, Negative, Slight, Permanent	Archaeological Monitoring
AAP30	Ninch	Greenfield environment. Potential to reveal below ground remains.	44+860- 44+980	A linewide works compound is proposed	Low	Medium	Direct, Negative, Slight, Permanent	Archaeological Monitoring
AAP31	Ninch	Demonstrated greenfield potential.	44+920-44+940	A UTX Diversion compound is located to the east of the railway tracks at Laytown Station	Low	Low	Direct, Negative, Slight, Permanent	Archaeological Monitoring
AAP32	Sevitsland	Area now under construction. Previously archaeologically investigated. An enclosure (RMP ME021-031) is located approx. 27m south of the proposed access track.	46+860- 46+960	Bettystown substation and Construction Compound and access track	Medium	Previously excavated Medium	Not Significant	No mitigation required
AAP33	Betaghstown	Greenfield potential. Underground diversions involving trench excavation	47+700	Utility Diversions (UG DV1) involving trenching	Low	Medium	Direct, Negative, Slight, Permanent	Archaeological Monitoring
AAP34	Colp East	Proximity to a recorded monument where geophysical anomalies were detected by these will remain unaffected by the proposed works.	49+100	Overhead divisions (OHDV1).	Medium	Low	Direct, Negative, Slight, Permanent	Works to take place under archaeological supervision

AAP Ref.	Townland	Potential	Chainage	Construction Ref:	Sensitivity Rating	Impact	Significance	Mitigation
AAP35	Colp East	Greenfield potential. No responses of interest were recorded in the geophysical survey.	49+540- 49+660	Track lowering works compound and track lowering works.	Low	Low	Direct, Negative, Slight, Permanent	Archaeological Monitoring
AAP36	Colp West	Demonstrated greenfield potential. Previous geophysical survey and testing revealed no archaeological features within the works area	49+760 – 50+300	UTX diversion compound	Medium/ Low	Medium	Direct, Negative, Moderate/ Slight, Permanent	Archaeological Monitoring
AAP37	Newtown	Greenfield and brownfield archaeological potential and industrial heritage potential.	51+680 – 52+480	Drogheda Station - Large scale earthmoving activities compound, bridge workstation works	Medium	Medium	Direct, Negative, Moderate, Permanent	Test excavation to assess the below ground archaeological potential of this greenfield area.
AAP38	Newtown	A 'Well' is shown on the 25 inch OS map in Newtown townland to the north of the avenue leading to Newtown Lodge. Area of archaeological potential.	51+680	Realignment of McGrath's Lane	Low	Medium	Direct, Negative, Slight, Permanent	Archaeological investigation prior to construction, to examine if the site of the well exists within the development area. If it does exist, it will be archaeologically examined, recorded (drawn and photographed) and digitally located.

